

TSD File Inventory Index

Date: December 12, 2000

Initial: CMB/med

Facility Name: <u>Dana Corporation (Victor Products Div) Chicago</u>		
Facility Identification Number: <u>140 068 469 386</u>		
A.1 General Correspondence		B.2 Permit Docket (B.1.2)
A.2 Part A / Interim Status	Y	.1 Correspondence
.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA)
.2 Notification and Acknowledgment	Y	C.1 Compliance - (Inspection Reports)
.3 Part A Application and Amendments	Y	C.2 Compliance/Enforcement
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications
.5 Change Under Interim Status Requests		.2 Import/Export Notifications
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment
.1 Correspondence		.1 RFA Correspondence
.2 Reports		.2 Background Reports, Supporting Docs and Studies
A.4 Closure/Post Closure	Y	.3 State Prelim. Investigation Memos
.1 Correspondence	Y	.4 RFA Reports
.2 Closure/Post Closure Plans, Certificates, etc	Y	D. 2 Corrective Action/Facility Investigation
A.5 Ambient Air Monitoring		.1 RFI Correspondence
.1 Correspondence		.2 RFI Workplan
.2 Reports		.3 RFI Program Reports and Oversight
B.1 Administrative Record		.4 RFI Draft /Final Report

Total - 1

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.8 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: Documents do not justify individual field inspection schedule.

**A.2 Part A/
Interim Status**



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

APR 5 1982

Mr. H. G. North, Director of Purchasing
P.O. Box 1333
Chicago, IL 60690

RE: Interim Status Acknowledgement USEPA ID No. ILD 068 469 386
FACILITY NAME: Dana Corp.-Victor Products Div.

Dear Mr. North:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,


Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: Parker Field III, Vice President, General Mgr.

TDS
04-05-82

FACILITY NAME

DANA CORP VICTOR PRODUCTS DIV CHGO PLT

EPA ID NUMBER

ILD068469386

FACILITY OPERATOR

VICTOR PRODUCTS DIV DANA CORPORATION

FACILITY OWNER

DANA CORPORATION

FACILITY LOCATION

5750 W ROOSEVELT ROAD
CHICAGO

IL 60650

PROCESS CODE

S01

DESIGN CAPACITY

6600.00000

UNIT OF MEASURE

G

*****KEY*****

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE	* UNIT OF MEASURE	CODE
STORAGE:				
CONTAINER	S01	G OR L	* GALLONS	G
TANK	S02	G OR L	* LITERS	L
WASTE PILE	S03	Y OR C	* CUBIC YARDS	Y
SURFACE IMPOUNDMENT	S04	G OR L	* CUBIC METERS	C
DISPOSAL:			* GALLONS PER DAY	U
INJECTION WELL	D79	G,L,U, OR V	* LITERS PER DAY	V
LANDFILL	D80	A OR F	* TONS PER HOUR	D
LAND APPLICATION	D81	B OR Q	* METRIC TONS\HOUR	W
OCEAN DISPOSAL	D82	U OR V	* GALLONS\HOUR	E
SURFACE IMPOUNDMENT	D83	G OR L	* LITERS\HOUR	H
TREATMENT:			* ACRE-FEET	A
TANK	T01	U OR V	* HECTARE-METER	F
SURFACE IMPOUNDMENT	T02	U OR V	* ACRES	B
INCINERATOR	T03	D,W,E, OR H	* HECTARES	Q
OTHER	T04	J,R,N,S,U,V	* POUNDS\HOUR	J
			* KILOGRAMS\HOUR	R
			* TONS PER DAY	N
			* METRIC TONS\DAY	S

VICTOR PRODUCTS DIVISION • CHICAGO PLANT

REPLY TO • P.O. BOX 1333 • CHICAGO, ILLINOIS 60690

Telephone: 312-287-6180 • Telex: 25-3051



DANA CORPORATION

May 17, 1985

Nicholas J. Malone
Gabriel and Associates
1814 N. Marshfield Avenue
Chicago, Illinois 60622

SUBJECT: Withdrawal from the TSD Program
Cicero/Dana Corp. Victor Products Div.
ILD068469386

Dear Mr. Malone:

Victor Products Division has obtained an acceptable quotation from American Waste Haulers to haul the organic solvents wastes stored at the current temporary storage facility at a frequency not to exceed 89 days. The increase in the haulage frequency is a response to our desire and intent to withdraw from the TSD program. Victor Products Division is currently prepared to issue a formal purchase order for the more frequent hauling. In fact, Victor Products Division is currently storing these wastes at this TSD facility for no more than 89 days.

Yours truly,

Richard J. Fraske
Chief Facilities Engineer
VICTOR PRODUCTS DIV. DANA CORP.
5750 W. Roosevelt Road
Chicago, Illinois 60650
(312) 287-6180

RJF/la

PT. A. file



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

ILD068469386

REACKNOWLEDGEMENT

INSTALLATION ADDRESS

DANA CORP VICTOR PRODUCTS DIV CHGO PLT
P O BOX 1333
CHICAGO IL 60690

5750 W ROOSEVELT ROAD
CHICAGO IL 60650

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

INSTALLATION'S EPA I.D. NO.

ILD068469386

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

DANA CORPORATION
PO BOX 1333
CHICAGO, IL 60690

III. LOCATION OF INSTALLATION

5750 W ROOSEVELT RD
CHICAGO, IL 60690**FOR OFFICIAL USE ONLY**

COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED
(yr., mo., & day)

F

31

800626

000009

I. NAME OF INSTALLATION

VICTOR PRODUCTS DIV. CHICAGO PLANT

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3

CITY OR TOWN

ST.

ZIP CODE

4

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5

CITY OR TOWN

ST.

ZIP CODE

6

CHICAGO

IL

60650

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

2

H. G. NORTH DIRECTOR PURCHASING

312

287

6180

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8

DANA CORPORATION

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☒ C. TXXX/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☒ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

ILD068469386

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

WILDO6846938621

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 1 23 - 26	2 F 0 0 3 23 - 26	3 F 0 0 5 23 - 26	4 23 - 26	5 23 - 26	6 23 - 26
7 23 - 26	8 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 23 - 26	14 23 - 26	15 23 - 26	16 23 - 26	17 23 - 26	18 23 - 26
19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 4 0 0 2 23 - 26	32 4 0 0 8 23 - 26	33 4 0 1 3 23 - 26	34 4 0 3 1 23 - 26	35 4 0 4 4 23 - 26	36 4 1 1 2 23 - 26
37 4 1 2 1 23 - 26	38 4 1 5 1 23 - 26	39 4 1 5 4 23 - 26	40 4 1 5 9 23 - 26	41 4 1 6 2 23 - 26	42 4 1 7 1 23 - 26
43 4 1 8 8 23 - 26	44 4 2 1 1 23 - 26	45 4 2 1 3 23 - 26	46 4 2 2 0 23 - 26	47 4 2 3 9 23 - 26	48 23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☒ 2. CORROSIVE
(D002)

☒ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE



NAME & OFFICIAL TITLE (type or print)

 Donald J. Reda
Plant Manager, Chicago Plant

DATE SIGNED

6/25/80



U.S. ENVIRONMENTAL PROTECTION AGENCY NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

ILD068469386

NAME OF INSTALLATION

VICTOR PRODUCTS DIV. CHICAGO PLANT

INSTALLATION MAILING ADDRESS

DANA CORPORATION
PO BOX 1333
CHICAGO, IL 60690

000026 JUL 18 80

LOCATION OF INSTALLATION

5750 W ROOSEVELT RD
CHICAGO, IL 60690

Chicago, IL 60650

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

FOR OFFICIAL USE ONLY

COMMENTS

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INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED (yr., mo., & day)

DANA CORP VICTOR PRODUCTS DIV
CHGO PLT

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A	
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8	0	7	1	8
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I. NAME OF INSTALLATION

V	I	C	T	O	R		P	R	O	D	U	C	T	S		D	I	V		C	H	I	C	A	G	O		P	L	A	N	T
---	---	---	---	---	---	--	---	---	---	---	---	---	---	---	--	---	---	---	--	---	---	---	---	---	---	---	--	---	---	---	---	---

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

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CITY OR TOWN

ST.

ZIP CODE

															IL		60650				
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III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

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CITY OR TOWN

ST.

ZIP CODE

CHICAGO															IL		60650				
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IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

H. G. NORTH DIRECTOR PURCHASING															312-287-6180									
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V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

DANA CORPORATION																								
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B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION

☐ B. TRANSPORTATION (complete item VII)

☒ C. TREATMENT/STORE/DISPOSE

☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR

☐ B. RAIL

☒ C. HIGHWAY

☐ D. WATER

☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If not your first notification, enter your installation's EPA I.D. Number in the space provided below.

☐ A. FIRST NOTIFICATION

☒ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

ILD068469386

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

IL00684693862

IX. DESCRIPTION OF HAZARDOUS WASTES (continued)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 1 23 - 26	2 F 0 0 3 23 - 26	3 F 0 0 5 23 - 26	4 23 - 26	5 23 - 26	6 23 - 26
7 23 - 26	8 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 23 - 26	14 23 - 26	15 23 - 26	16 23 - 26	17 23 - 26	18 23 - 26
19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 U 0 0 2 23 - 26	32 U 0 0 8 23 - 26	33 U 0 1 3 23 - 26	34 U 0 3 1 23 - 26	35 U 0 4 4 23 - 26	36 U 1 1 2 23 - 26
37 U 1 2 1 23 - 26	38 U 1 5 1 23 - 26	39 U 1 5 4 23 - 26	40 U 1 5 9 23 - 26	41 U 1 6 2 23 - 26	42 U 1 7 1 23 - 26
43 U 1 8 8 23 - 26	44 U 2 1 1 23 - 26	45 U 2 1 3 23 - 26	46 U 2 2 0 23 - 26	47 U 2 3 9 23 - 26	48 23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. FLAMMABLE (D001)

☒ 2. CORROSIVE (D002)

☐ 3. REACTIVE (D003)

☒ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE <i>Donald J. Reda</i>	NAME & OFFICIAL TITLE (type or print) Donald J. Reda Plant Manager, Chicago Plant	DATE SIGNED 7-17-80
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FORM 1 GENERAL		ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION <i>Consolidated Permits Program</i> (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER F I L D 0 6 8 4 6 9 3 8 6 3 D	
LABEL ITEMS		PLEASE PLACE LABEL IN THIS SPACE DANA CORP		GENERAL INSTRUCTIONS	
II. FACILITY NAME				If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
V. FACILITY MAILING ADDRESS					
VI. FACILITY LOCATION					

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		Yes	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 VICTOR PRODUCTS DIV. CHICAGO PLANT

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)	
2 NORTH, H. G. PURCHASING DIRECTOR	3 1 2	2 8 7	6 1 8 0

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX		
3 P.O. BOX 1333		
B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 CHICAGO	IL	6 0 6 9 0

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER			
5 5750 W. ROOSEVELT ROAD			
B. COUNTY NAME			
COOK			
C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6 CHICAGO	IL	6 0 6 5 0	031

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
C	7	3	2	9	3	(specify)					C	7	(specify)						
15	16	17	18	19						15	16	17	18	19					
C. THIRD										D. FOURTH									
C	7	(specify)								C	7	(specify)							
15	16	17	18	19						15	16	17	18	19					

VIII. OPERATOR INFORMATION

A. NAME																									B. Is the name listed in Item VIII-A also the owner?						
C	8	VICTOR PRODUCTS DIV. DANA CORPORATION																							<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO						
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	66					
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																				D. PHONE (area code & no.)											
F = FEDERAL M = PUBLIC (other than federal or state) S = STATE O = OTHER (specify)																				P (specify)						A 3 1 2 2 8 7 6 1 8 0					
P = PRIVATE																															

E. STREET OR P.O. BOX																									IX. INDIAN LAND	
5 7 5 0 W. ROOSEVELT ROAD																									Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
F. CITY OR TOWN															G. STATE		H. ZIP CODE									
C H I C A G O															I L		6 0 6 5 0									

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)									
C	9	N								C	9	P							
15	16	17	18	19	20	21	22	23	24	15	16	17	18	19	20	21	22	23	24
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)									
C	9	U								C	9	Z	7 9 2 6 2 9						
15	16	17	18	19	20	21	22	23	24	15	16	17	18	19	20	21	22	23	24
C. RCRA (Hazardous Wastes)										E. OTHER (specify)									
C	9	R								C	9								
15	16	17	18	19	20	21	22	23	24	15	16	17	18	19	20	21	22	23	24

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

AUTOMOTIVE AND HEAVY DUTY ENGINE GASKET MANUFACTURING.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)															B. SIGNATURE															C. DATE SIGNED									
Donald J. Reda Plant Manager																														11-12-84									

COMMENTS FOR OFFICIAL USE ONLY

COMMENTS FOR OFFICIAL USE ONLY																									
C																									
15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40

376

FORM 3 RCRA		ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)		I. EPA I.D. NUMBER F I L D 0 6 8 4 6 9 3 8 6 3 1	
II. FIRST OR REVISED APPLICATION					
APPLICATION APPROVED		DATE RECEIVED (yr., mo., & day)		COMMENTS	
III. PROCESSES - CODES AND DESIGN CAPACITIES					
A. FIRST APPLICATION (place an "X" below and provide the appropriate date)					
1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)			2. NEW FACILITY (Complete item below.)		
C YR. MO. DAY 8 21 01 01			C YR. MO. DAY 8 1 01 15		
B. REVISED APPLICATION (place an "X" below and complete Item I above)					
1. FACILITY HAS INTERIM STATUS			2. FACILITY HAS A RCRA PERMIT		
A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).					
B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.					
1. AMOUNT - Enter the amount.					
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.					
PROCESS		PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE
Storage:				Treatment:	
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS		TANK	T01
TANK	S02	GALLONS OR LITERS			
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS		SURFACE IMPOUNDMENT	T02
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS		INCINERATOR	T03
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS		OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		
EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.					
S C DUP T/A C 3 1					
B. PROCESS DESIGN CAPACITY					
A. PRO- CESS CODE (from list above)		1. AMOUNT (specify)		2. UNIT OF MEAS- URE (enter code)	
FOR OFFICIAL USE ONLY		FOR OFFICIAL USE ONLY		FOR OFFICIAL USE ONLY	
X-1 S 0 2		600		G	
X-2 T 0 3		20		E	
1 S 0 1		6,600		G	
3					
4					

NOV 12 1980

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE **CODE**
 POUNDS.....P
 TONS.....T

METRIC UNIT OF MEASURE **CODE**
 KILOGRAMS.....K
 METRIC TONS.....M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

325

[illegible]

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S	T/A	C
F	I	D
0	6	8
4	6	9
3	8	6
3	6	

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

65	66	67	68	69	70	71
----	----	----	----	----	----	----

72	73	74	75	76	77	78
----	----	----	----	----	----	----

VIII. FACILITY OWNER
☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

C	D	A	N	A	C	O	R	P	O
E									

4	1	9	5	3	5	4	5	1	0
---	---	---	---	---	---	---	---	---	---

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

C	F
4	5
0	0
D	o
r	r
S	t
r	e
e	t

C	G
T	o
l	e
d	o

O	H
---	---

4	3	6	9	7
---	---	---	---	---

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

Parker Field III
V.P. & General Manager

B. SIGNATURE

Parker Field III

C. DATE SIGNED

11/12/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

Donald J. Reda
Plant Manager

B. SIGNATURE

Donald J. Reda

C. DATE SIGNED

11-12-80

316

V. FACILITY DRAWING (see page 4)

~~North~~ —→

VICTOR
PARKING

VICTOR
PARKING

ALLEY

TWO (2) STORY DWELLINGS

VICTORS
VACANT
LOT

CHICAGO PUBLIC
SCHOOL PROPERTY

ALLEY

TWO (2) STORY DWELLINGS

VICTORS
VACANT
LOT

W. MEYHING TOWN ST

MENARD AVE.

WEST ROOSEVELT ROAD

VICTOR PRODUCTS
DANA CORP.

EPA I.D. NO.
II D068469386

FILMORE STREET

VICTOR PRODUCTS
DANA CORP.

HOT POINT CO.

HC KNOKE CO.

RR TRACKS

WAREHOUSE

R.R. TRACKS

PHEDLL MFG. Co.

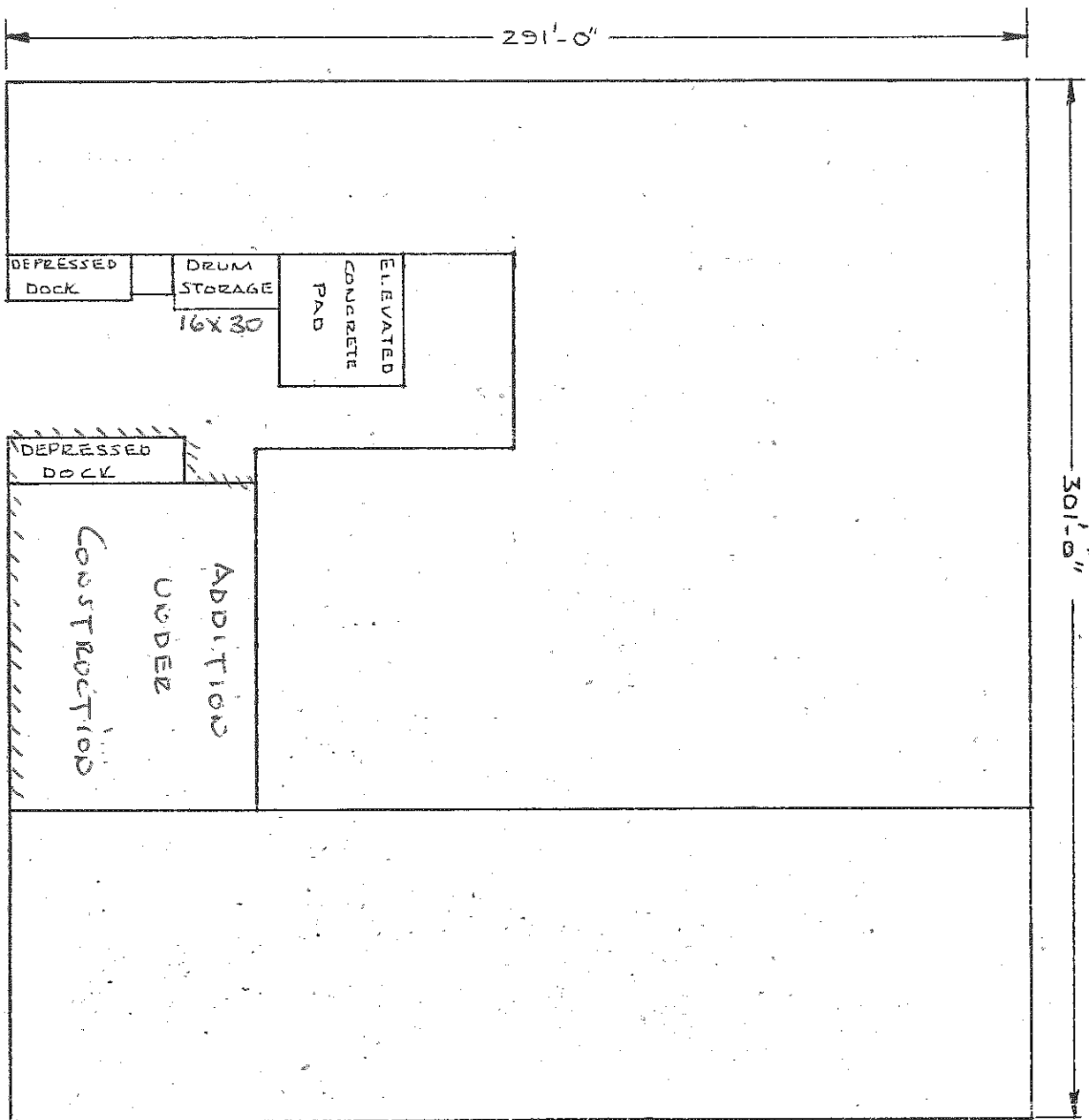
HOT POINT
PARKING LOT

HOT POINT CO.

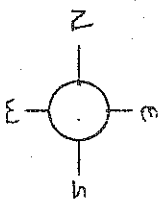
276

38

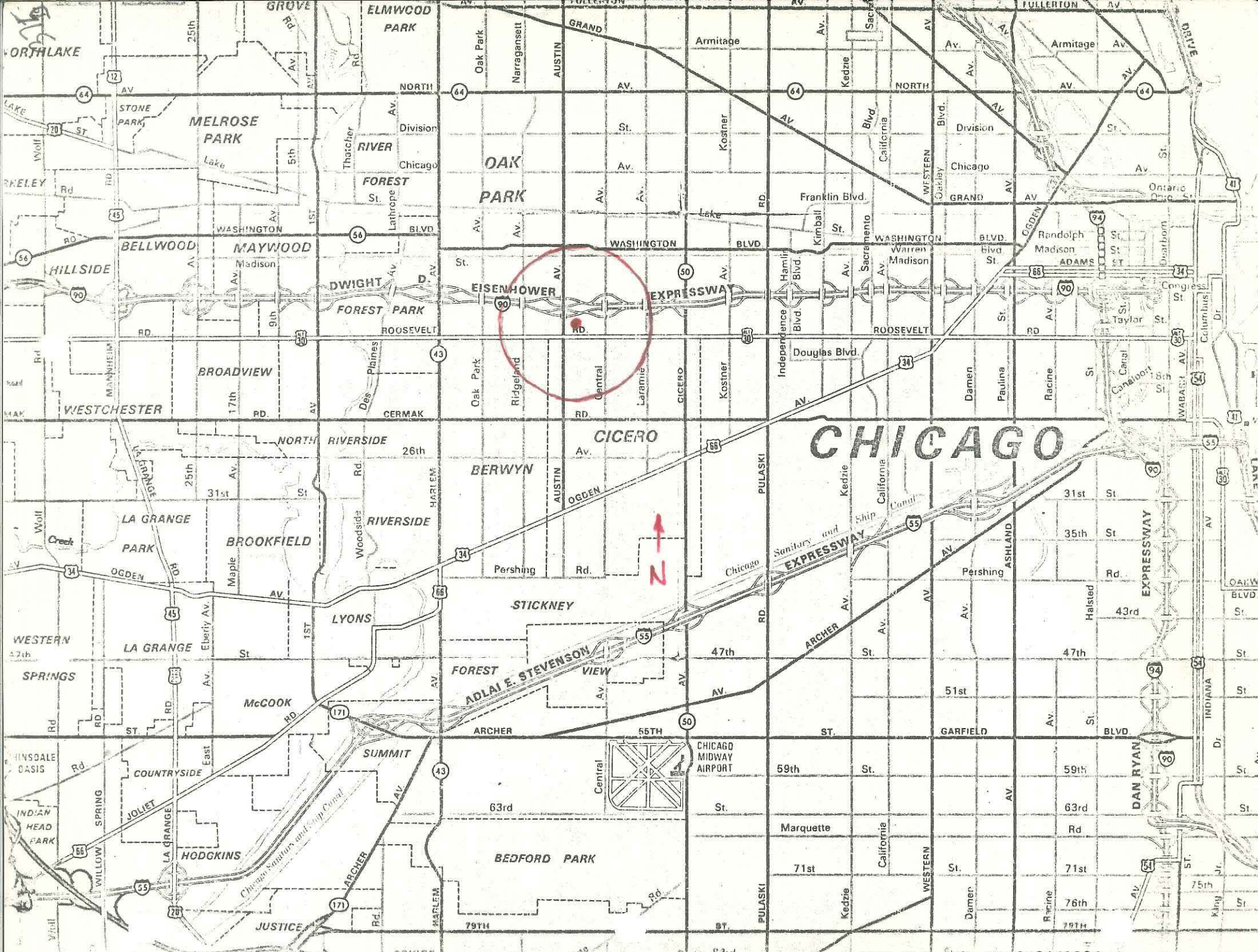
EPA I.D. NO. ILDO68469386



FILLMORE ST.



DA
VI
R DIVISIONS
CORPORATION
CHICAGO, ILLINOIS 60690





CORPORATE OFFICES

Environmental Protection Agency
Region V/RCRA Activity
230 S. Dearborn Street
Chicago, Illinois 60604

Dear Sir:

I am the chief financial officer of Dana Corporation, P.O. Box 1300, Toledo, Ohio 43697. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

- A. Dana Corporation
Weatherhead Division
203 Weatherhead Street
Angola, Indiana 46703
ID#-IND 005 480 942
Closure - \$126,000
Post-closure -\$0-



DANA CORPORATION

- B. Dana Corporation
Spicer Clutch Division
Fifth and Brandon Streets
Auburn, Indiana 46706
ID#-IND 005-478-466
Closure - \$200,000
Post-closure - \$150,000
- C. Dana Corporation
Weatherhead Division
West Ellsworth Street
P.O. Box 131
Columbia City, Indiana 46725
ID#-IND 000 804 781
Closure - \$40,000
Post-closure -\$0-
- D. Dana Corporation
Victor Products Division
Chicago Gasket Plant
5750 West Roosevelt Road
P.O. Box 1333
Chicago, Illinois 60690
ID#-ILD 068 469 368
Closure - \$20,000
Post-closure -\$0-
- E. Dana Corporation
Weatherhead Division
U.S. Route 24
Antwerp, Ohio 45813
ID#-OHD 005 039 730
Closure - \$10,000
Post-closure - \$84,000
- F. Dana Corporation
Spicer Transmission Division
4100 Bennett Road
P.O. Box 986
Toledo, Ohio 43696
ID#-OHD 052 813 540
Closure - \$35,000
Post-closure -\$0-
- G. Dana Corporation
Perfect Circle Division
1900 Summit
P.O. Box 2027
Hastings, Nebraska 68901
ID#-NED 091 998 567
Closure - \$20,000



DANA CORPORATION

- H. Dana Corporation
Spicer Axle Division
Fort Wayne Plant
2100 West State Blvd.
P.O. Box 750
Fort Wayne, Indiana 46801
ID#-IND 005 470 885
Closure - \$10,000
Post-closure -\$0-
- I. Dana Corporation
Boston Industrial Products
P.O. Box 500
Hohenwald, Tennessee 38462
ID#-IND 004 045 605
Closure - \$187,000
Post-closure - \$200,000
- J. Dana Corporation
Tyrone Hydraulics
Corner of Fulton and Golding Drives
P.O. Box 511
Corinth, Mississippi 38834
ID#-MSD 007 020 043
Closure - \$5,000
Post-closure - \$10,000

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None.

3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the



following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: None.

.. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year ended December 31, 1982.

ALTERNATIVE II

1. Sum of current closure and post-closure cost estimates
(total of all cost estimates shown in the four paragraphs
above) ----- \$1,087,000
2. Current bond rating of most recent insurance of this
firm and name of rating service ----- Moody's A2,
S & P AA
3. Date of issuance of bond ----- June 15, 1981
4. Date of maturity of bond ----- June 15, 2006
5. Tangible net worth (if any portion of the closure and
post-closure cost estimates is included in "total liabilities
on your firm's financial statements, you may add the amount of
that portion to this line) ----- \$913,000,000
6. Total assets in U.S. (required only if less than 90% of
firm's assets are located in the U.S.) ----- \$1,578,000,000

- | | Yes | No |
|--|-----|----|
| 7. Is line 5 at least \$10 Million? | Yes | |
| 8. Is line 5 at least 6 times line 1? | Yes | |
| 9. Are at least 90% of firm's assets located in
the U.S.? If not, complete line 10. | | No |
| 10. Is line 6 at least 6 times line 1? | Yes | |



DANA CORPORATION

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.

Very truly yours,

DANA CORPORATION

By

Robert E. Byrket

Robert E. Byrket

Vice President-Finance & Administration

April 18, 1983

INCUMBENCY CERTIFICATE

I, Sue Ann Griffin, Assistant Secretary of Dana Corporation, a Virginia corporation, do hereby certify that Robert E. Byrket, holds and continues to hold the chief financial officer position at Dana Corporation; namely, Vice President-Finance and Administration and Chief Financial Officer. I further certify that the signature set forth on the accompanying document is that of Robert E. Byrket.

(SEAL)

Sue Ann Griffin
Assistant Secretary

Price
Waterhouse

1600 NATIONAL BANK BUILDING
506 MADISON AVENUE
TOLEDO, OH. 43604
419 255-2760

April 20, 1983

Mr. Robert E. Byrket
Chief Financial Officer
Dana Corporation
4500 Dorr Street
Toledo, Ohio 43615

Dear Mr. Byrket:

We have examined the consolidated balance sheet of Dana Corporation and its Consolidated Subsidiaries as of December 31, 1982 and the related consolidated statements of income, of shareholders' equity and of changes in financial position for the year then ended. Our examination was made in accordance with generally accepted auditing standards and accordingly included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances. Our report thereon, which contains a qualification as to consistency, appears on page F-14 of Dana's Annual Report.

In connection with your letter to the Regional Administrator of the Environmental Protection Agency, we compared "Tangible net worth" of \$913 million (shareholders' equity of \$1,019 million less goodwill of \$106 million) indicated in item 5 and "Total assets in U.S." of \$1,578 million (which includes \$501 million of "Corporate assets") in item 6 to the corresponding amounts in the audited financial statements from which such amounts were derived and found such amounts to be in agreement.

Yours very truly,

Price Waterhouse

**A.4 Closure/
Post-Closure**



Mary Murphy

217/782-6762

Refer to: 0310510003 - Cook County
Dana Corp, Victor Products Division
Closure Plan Approved: February 13, 1986 Log #128
ILD068469386
RCRA-Closure

January 8, 1987

Dana Corporation
Victor Products Division
P.O. Box 1333
Chicago, IL 60690

Dear Sir:

The subject hazardous waste management facility was inspected by a representative of this Agency on October 21, 1986. The inspection revealed that the closure activity was completed in accordance with the approved closure plan dated February 13, 1986.

Certification that the hazardous waste container storage area (S01), has been closed in accordance with the approved closure plan by the owner/operator, Dana Corporation, Victor Product Division, Chicago, Illinois, and an independent registered professional engineer, John Polich, of Illinois was received at this Agency September 15, 1986.

The Agency has determined that the closure of the Dana Corporation, Victor Products Division, Chicago has met the requirements of Interim Status Standards, 35 Ill. Admin. Code, Part 725 (40 CFR, Part 265). Please note, the Agency has modified your Part A application to reflect status change due to completed closure activities.

This facility must continue to meet the applicable requirements of 35 IAC Part 722 - Standards Applicable to Generators of Hazardous Waste and Part 723 - Standards Applicable to Transporters of Hazardous Waste.

5/21/87

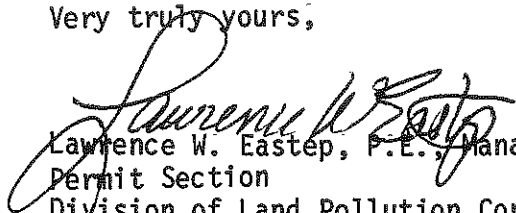
*Sent Changes to
Data Entry*



Page 2

If you have any questions, please contact Eugene Theios at 217/782-6762.

Very truly yours,


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:ET:st:1081g,60-61

cc: Northern Region
USEPA Region V, Mary Murphy
John Polich, P.E.
Division File
Financial Assurance Unit
Compliance Monitoring

**C.2 Compliance/
Enforcement**

DANA CORP V-W-86-R-54 + 49

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery.

3. Article Addressed to:

J.P. O'Brien
Chapman & Cutler
111 W. Monroe St.
Chicago, IL

4. Article Number

301 048 260

Type of Service:

- ☐ Registered ☐ Insured
☐ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and **DATE DELIVERED**.

5. Signature — Addressee

X *Jemi O'Brien*

6. Signature — Agent

X

7. Date of Delivery

4/3/87

8. Addressee's Address (ONLY if requested and fee paid)

PART I BACKGROUND

Facility Name Dana CorporationFacility RCRA ID Number ILD 068-469 386Docket Number V-W-86-R-49RES Assignee O. Warnsley ORC Assignee Nola HicksSummary of Agreement To submit necessary documents to comply with the financial responsibility requirements (35 Ill Adm Code 725.243 & 247)

PART II CONCURRENCES ON DRAFT CAFO

	Initials	Date	Agree	Disagree
RES Assignee	<u>Olw</u>	<u>2-4-87</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief, RCRA Enf. Unit	<u>RK</u>	<u>2/4/87</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief, RCRA Enf. Sect.	<u>DR for WEM</u>	<u>2-5-87</u>	<input checked="" type="checkbox"/> <i>no change in come letter and order</i>	<input type="checkbox"/>
Asst. Regional Counsel	<u>NH</u>	<u>2-9-87</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief, S.W.E.R. Sect.	<u>Em for JD</u>	<u>2-9-87</u>	<input checked="" type="checkbox"/> <i>see comments p. 3 & 4?</i>	<input type="checkbox"/>

PART III RETURN TO ORC ASSIGNEE FOR TRANSMITTAL OF DRAFT TO THE FACILITY

PART IV FINAL CAFO APPROVAL

	Initials	Date	Agree	Disagree
RES Assignee	<u>Olw</u>	<u>3/6/87</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief, RCRA Enf. Unit	<u>RK</u>	<u>3/6/87</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief, RCRA Enf. Sect.	<u>WEM</u>	<u>3/7/87</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief, HWEB	<u>SWH</u>	<u>3/10/87</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Asst. Regional Counsel	<u>NH</u>	<u>3/10/87</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief, S.W.E.R. Sect. <i>rec'd. 3/18</i>	<u>JD</u>	<u>3/18/87</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief, S.W.E.R. Branch	<u>Mc</u>	<u>3/18/87</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>for</i> Deputy, Regional Counsel	<u>MBS</u>	<u>3/23/87</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Regional Counsel	<u>JD</u>	<u>3/24/87</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Director, WMD	<u>Mc for WMD</u>	<u>3/30/87</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Regional Administrator			<input type="checkbox"/>	<input type="checkbox"/>

PART V RETURN TO D. REAPE, 5HE-12, FOR MAILING



217/762-6761

Refer to: # 0310610003 -- Cook County
Dana Victor Products
ILD 068469386
RCRA - Permits

May 6, 1986

Dana Victor Products
5750 W. Roosevelt Road
Cicero, Illinois 60650

Attn: Environmental Coordinator or
Plant Manager

Dear Sir:

According to Agency files, your facility currently manages hazardous waste in containers and/or tanks subject to the requirements of 35 IAC 700-726. 35 IAC 703.157(f) states that interim status for any hazardous waste storage or treatment facility will be terminated November 8, 1992, unless the facility submits Part B of the RCRA permit application for these units to this Agency by November 8, 1988. This letter is written to (1) make you aware of this requirement and (2) describe the actions which must be taken in response to this requirement.

According to 35 IAC 703.157(f), if an existing facility desires to (1) store hazardous waste on-site for greater than ninety (90) days, (2) treat hazardous waste, or (3) store hazardous waste as a commercial facility after November 8, 1992, it must submit Part B of the RCRA permit application to this Agency by November 8, 1988. The information which must be contained in this application is described in 35 IAC 703, Subpart B. The enclosed document, entitled "RCRA Permit Guidance" provides more detail regarding the necessary contents of the application and also identifies several guidance documents which will be useful in developing the application. Also included in this document is the form which must be used when submitting the application.

If a facility does not desire to continue storing and/or treating hazardous waste after November 8, 1992, it must close the storage and/or treatment unit(s) present at the facility prior to this date. Closure, in this instance, basically means that all contamination must be removed from the unit(s) and if necessary, from the area surrounding these units. The requirements which must be met in closing these units are contained in 35 IAC 726, Subpart C. For your convenience, guidance for the development of a closure plan is contained in the enclosed document entitled "Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities." PLEASE NOTE THAT A CLOSURE PLAN DOES NOT NEED TO BE SUBMITTED AT THIS TIME. IT MUST HOWEVER, BE SUBMITTED TO THE AGENCY NO LATER THAN MAY 8, 1992.



Page 2

In some instances, there may be several interim status hazardous waste management units at a facility. The facility may desire to pursue a final RCRA permit for a portion of these units and close the rest of them. Because of the uncertainty associated with this option, all interim status units at a facility must be included in Part B of the RCRA permit application, unless a closure plan for the units being closed is submitted with the Part B. If a closure plan is submitted with the Part B, the application need only address those units which will remain in operation.

The only alternatives available for hazardous waste treatment and storage facilities to meet the requirements of 35 IAC 703.157(f) are (1) submit Part B of the RCRA permit application by November 8, 1988 or (2) close by November 8, 1992. However, some facilities may have previously filed Part A of the RCRA permit application in error and now feel that the hazardous waste management activities carried out at the facility do not require a RCRA permit (i.e. the Part A was filed for protective measures). If this is the case, the Agency requests that information supporting this position be submitted no later than November 8, 1988. The Agency can then review the information submitted and correct its records accordingly. The information which must be submitted to make this demonstration is contained in the enclosed document entitled "Facility Part A Withdrawal Request Form."

Finally, some facilities may have closed or are currently closing in accordance with an IEPA approved closure plan. (Please bear in mind this letter is going out to over 200 facilities; some closed facilities may inadvertently receive this letter.) In this instance, the Agency requests that a copy of (1) the closure plan approval letter and (2) the letter from the Agency accepting the certifications of the owner/operator and the registered professional engineer that closure was carried out in accordance with the approved closure plan (if closure has been completed) be submitted by November 8, 1988. The Agency will again be able to review this information and correct its records accordingly.

Because of the large number of facilities subject to the requirements of 35 IAC 703.157(f), the Agency requests that all facilities receiving this letter complete the enclosed form entitled "RCRA Permit Information Form." The form has been developed such that it can be used by a facility falling into any of the five categories described above (pursuing a final permit, planning to close, pursuing a permit for only a portion of the interim status units and closing the other units, protective filers, closed in accordance with an IEPA approved closure plan). This form must be submitted to the Agency no later than November 8, 1988, along with all required attachments. Failure to do so may subject a facility to enforcement under State and/or Federal regulations and possible monetary penalties up to \$25,000 per day of noncompliance.



Page 3

The RCRA Permit Information Form and all required attachments must be submitted in triplicate (original and two (2) copies) to the following address:

Permit Section, RCRA Unit
Division of Land Pollution Control
Illinois Environmental Protection Agency
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

If you have any questions regarding this letter, please contact Jim Moore at 217/782-9875.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:JKH:dks/1238j/1244j/1-3

Enclosures

cc: Division File
Compliance
Maywood Region
USPEA Region V



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James P. O'Brien, Esq.
Chapman and Cutler
111 West Monroe Street
Chicago, Illinois 60603

Re: Dana Corporation
RCRA Docket No. V-W-86-R-49

Dear Mr. O'Brien:

This letter acknowledges receipt of the signed copy of the Consent Agreement and Final Order in the above-identified matter. Returned herewith is one fully executed copy containing the signatures of Mr. Constantelos and Mr. Adamkus. The original copy has been filed with the Regional Hearing Clerk. Payment of the \$3,500 penalty is due within thirty (30) days of the date that Mr. Adamkus signed the order.

Your cooperation in resolving this matter is appreciated.

Very truly yours,

for William H. Miner, Chief
Hazardous Waste Enforcement Branch

Enclosures

APR 1 1987

301-048-260

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James P. O'Brien, Esq.
Chapman and Cutler
111 West Monroe Street
Chicago, Illinois 60603

Re: Dana Corporation
RCRA Docket No. V-W-86-R-49

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Your cooperation in resolving this matter is appreciated.

Very truly yours,

William H. Miner, Chief
Hazardous Waste Enforcement Branch

Enclosures

NH/mc:disk#2

Olw KA WEM
3/6/87 3/6/87 3/9/87

W/3/10/87
WHM

- bcc: ① - Regional Hearing Clerk ✓
② OWPE - WH 527 ✓
③ D. Ruple ✓
④ ORC - Decker ✓
⑤ Totomayer ✓
⑥ Warnely ✓
⑦ HKKS ✓

STAFF ATTORNEY 3/10/87 MH
SECTION CHIEF 3/18/87
BRANCH CLERK
DEPUTY REG. COUNSEL
REGIONAL COUNSEL
OTHER
OTHER

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF

DANA CORPORATION
VICTOR PRODUCT DIVISION
5750 W. ROOSEVELT ROAD
CHICAGO, ILLINOIS 60690
ILD 068 469 386

DOCKET NO. V-W-86-R-49
STAFF ATTORNEY
SECTION CHIEF
BRANCH CHIEF
DEPUTY REG. COUNSEL
REGIONAL COUNSEL
OTHER
OTHER

CONSENT AGREEMENT AND
FINAL ORDER
3/10/87 N.H.
3/18/87 D
3/18/87 N.H.
3/23/87
3/27/87
3/31/87

PREAMBLE

On June 13, 1986, a Complaint and Compliance Order was filed in this matter pursuant to Section 3008(a)(1) of the Resource Conservation and Recovery Act of 1976 (RCRA) as amended, 42 U.S.C. §6928(a)(1), and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director of the Waste Management Division, Region V, United States Environmental Protection Agency (U.S. EPA). The Respondent is the Dana Corporation, 5750 W. Roosevelt Road, Chicago, Illinois.

STIPULATIONS

The parties to this action, desiring to settle this action, and believing that this settlement is in the public interest, stipulate to the following:

- A. Respondent has been served with a copy of the Complaint and Compliance Order, and Notice of Opportunity for Hearing;
- B. Respondent admits the jurisdictional allegations of the Complaint set forth as unnumbered paragraphs averred as "Jurisdiction";
- C. Respondent neither admits nor denies the specific factual allegations contained in the Complaint, or the legal conclusions recited therein;

- D. Respondent explicitly waives its right to request a hearing on the allegations contained in the Complaint filed herein, except to the extent that the Complainant has reserved its rights in this Consent Agreement and Final Order;
- E. Respondent neither admits nor denies any violations alleged in the Complaint, but Complainant consents and agrees that Respondent has achieved compliance for those alleged violations averred in Findings 8, 10, 11, 12, 13, 15, 18 and 19 of the Complaint;
- F. On January 31, 1986, the State of Illinois was granted final authorization by the Administrator of the U.S. EPA, pursuant to Section 3006(b) of RCRA, 42 U.S.C. §6926(b), to administer a hazardous waste program in lieu of the Federal program. Section 3008 of RCRA, 42 U.S.C. §6928, provides that the U.S. EPA may enforce State regulations in those States authorized to administer a hazardous waste program;
- G. Respondent consents to the issuance of the Order hereinafter recited and hereby consents to the payment of a civil penalty in the amount hereinafter stipulated; the penalty is to be paid within thirty (30) days of this Order becoming final;
- H. Complainant consents to the issuance of the Order hereinafter recited and hereby agrees that the Order is a final and proper administrative adjudication as to all of the matters alleged in the Complaint; and
- I. This Consent Agreement and Final Order shall become effective on the date it is signed by the Regional Administrator.

FINAL ORDER

Based upon the foregoing stipulations, the parties agree to the entry of the following Order in this matter:

A. Respondent shall, within thirty (30) days of this Order becoming final, provide to U.S. EPA and IEPA the following:

1. Documents necessary for providing financial assurance for closure, as required by 35 Ill. Adm. Code 725.243. In addition, the Respondent shall provide a Letter from the Chief Financial Officer which will indicate that no post-closure expenses are expected and thus none estimated.

2. Proof of sudden liability insurance coverage to meet the liability requirement of 35 Ill. Adm. Code 725.247.

B. Respondent shall, within thirty (30) days of this Order becoming final, pay a civil penalty in the amount of THREE THOUSAND FIVE HUNDRED DOLLARS (\$3,500), payable to the Treasurer of the United States of America and mailed to U.S. EPA Region V, P.O. Box 70753, Chicago, Illinois 60673. A copy of the transmittal of payment shall be mailed to Ms. Beverly Shorty, Regional Hearing Clerk, Planning and Management Division, U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604 and to the Office of Regional Counsel, SWERB Branch Secretary, 230 South Dearborn Street, Chicago, Illinois 60604. Failure to comply with any requirement of the Order shall subject Respondent to liability for a civil penalty of up to TWENTY-FIVE THOUSAND DOLLARS (\$25,000) for each day of continued non-compliance with the terms and conditions in this Order.

C. Interest shall accrue on any amounts overdue under the terms of this Consent Agreement and Final Order at the rate established by the Secretary of the Treasury pursuant to 31 U.S.C. §3717. A late payment charge of \$20.00 will be imposed after thirty (30) days, with an additional charge of \$10.00 for each subsequent 30-day period over which an unpaid balance remains. In addition, a six percent per annum penalty will be applied on any principal amount not paid within ninety (90) days of the date that this Consent Agreement and Final Order is signed by the Regional Administrator.

Notwithstanding any other provision of this Order, an enforcement action may be brought pursuant to Section 7003 of RCRA or other statutory provisions should U.S. EPA find that the handling, storage, treatment, transportation or disposal of solid waste or hazardous waste at the facility may present an imminent and substantial endangerment to human health or the environment. U.S. EPA also expressly reserves the right to take any action necessary under Section 3008 of RCRA to enforce compliance with the applicable provisions of 35 Ill. Adm. Code Part 720 et seq., 40 CFR Parts 124 and 270, and this CAF0, except to the extent that those matters have been raised in the proceedings herein.

SIGNATORIES

Each undersigned representative of a signatory to this Consent Agreement and Final Order certifies that he or she is fully authorized to enter into the terms and conditions of this Consent Order and to legally bind such signatory to this document.

Agreed this 2nd day of March, 1987.

By [Signature]
Dana Corporation
Respondent

Agreed this _____ day of _____, 1987.

By _____
Basil G. Constantelos, Director
Waste Management Division
U.S. Environmental Protection Agency
Region V, Complainant

The above being agreed and consented to, it is so ordered

this _____ day of _____, 1987.

By _____
Valdas V. Adamkus
Regional Administrator
U.S. Environmental Protection Agency
Region V

MAR 31 1987

MEMORANDUM

SUBJECT: Dana Corporation
Consent Agreement and Final Order
Docket No. RCRA-V-W-86-R-49

FROM: Robert B. Schaefer Basil G. Constantelos, Director
Regional Counsel Waste Management Division

TO: Valdas V. Adamkus
Regional Administrator

Accompanying this memorandum is a Consent Agreement and Final Order (CAFO) signed by the above-identified company. In the CAFO, the company agrees to provide the documents necessary for financial assurance for closure, and agrees to provide proof of sudden liability insurance. In addition, the company agrees to pay a penalty of \$3,500.

On June 13, 1986, the U.S. EPA issued a Complaint and Compliance Order in this matter. The Complaint proposed a penalty of \$13,500. We recommend that you sign both copies of the attached CAFO.

NH/mc disk#2

olew
3/6/87
Ra
3/6/87

mc
3/31/87

STAFF ATTORNEY	3/16/87	NA
SECTION CHIEF	3/18/87	TD
BRANCH CHIEF	3/18/87	MA
DEPUTY REG. COUNSEL	3/24/87	MA
REGIONAL COUNSEL	3/24/87	MA
OTHER	3/24/87	MA
OTHER		

FEB 11 1987

5HE-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jim O'Brien
Chapman and Cutler
111 West Monroe Street
Chicago, Illinois 60603

Re: Consent Agreement and Final Order
Dana Corporation
ILD 068 469 386

Dear Mr. O'Brien:

I have enclosed herewith a draft Consent Agreement and Final Order (CAFO). As you will note, we have incorporated many of your comments into the new draft. Please review the CAFO and if acceptable have the two originals signed by the appropriate party or parties within two weeks of your receipt of this letter and return them to me. The United States Environmental Protection Agency will sign both documents and return one to you.

Sincerely,

Nola Hicks
Assistant Regional Counsel

Enclosure

5HE-12:OWARNSLEY:6533:ea-11-25-86 WARNSLEY DISK #2
rev: o. robinson:2/3/87
rev: o. robinson:2/9/87

	TYPIST	AUTHOR	OTHER STAFF	UNIT CHIEF	SECT. SECY	SECT. CHIEF	UNIT CHIEF	UNIT SECY
INIT. DATE	O.R. 2/3/87	olw 2/3/87		AK 2/4/87	AP 2-4-87	WEM 2-5-87		

see dump

CHAPMAN AND CUTLER

a partnership including professional corporations

Theodore S. Chapman
1877-1943
Henry E. Cutler
1959

111 West Monroe Street, Chicago, Illinois 60603

TWX 910-221-2103 Telex 206281
Telephone 312 845-3000

Salt Lake City Office
50 South Main Street
Salt Lake City, Utah 84144
Telephone 801 533-0066

September 24, 1986

Ms. Nola Hicks
Assistant Regional Counsel (5C-16)
United States Environmental Protection
Agency
Region 5
230 South Dearborn Street
Chicago, Illinois 60604

Re: In the Matter of Dana Corporation, Victor
Products Division, Docket Nos. V-W-86-R-49
and V-W-86-R-54 pending before the United States
Environmental Protection Agency, Region V

Dear Ms. Hicks:

Thank you for the opportunity to meet with you on Tuesday, September 23, 1986 for an informal settlement conference regarding the above-captioned proceedings. In that regard, please find enclosed copies of documents we numbered at the conference as Exhibits 1 through 18 and which pertain to the allegations of the complaint. After our discussions, it appears that with regard to settlement, we agree upon the technical issues, but we may be somewhat apart on the settlement amount. In order to facilitate our resolution of this matter, let us summarize below the results of our settlement conference; of course, these understandings relate only to settlement and we do not waive or prejudice our rights in this proceeding by setting forth these matters herein.

With regard to the technical matters, we agreed that the following items would be accomplished within thirty days of the entry of an agreed order. First, Dana will make the appropriate mark on the Hazardous Waste Facility Certificate of Liability Insurance, Exhibit 10, to indicate whether the coverage applies to sudden accidental occurrences, non-sudden accidental occurrences or both sudden and non-sudden accidental occurrences. Second, Dana will resubmit the Letter from Chief Financial Officer, Exhibit 11, without an amount for the estimate of post-closure expenses of the Robinson facility, presuming there will be no post-closure expenses at that facility. Third, Dana will submit an amended Part A which will make clear that the surface depression is not a surface impoundment. As we discussed, these actions will resolve any issues regarding compliance with the technical issues raised by the complaints.

In addition, as we discussed, we still have a disagreement regarding the settlement amount to be included in the order. Prior to our conference, we had reviewed the documentation, which have been marked as exhibits, and determined that there were no violations against which a civil penalty could be assessed. Thus, as you correctly surmised, we were not prepared to agree to any settlement amount. After our discussion, it appears that at most we were four weeks late filing the closure plan and cost estimates, although we had requested an extension by way of a letter to the IEPA which went answered. In addition, the mistake on the Letter from Chief Financial Officer showing a post-closure cost for the Robinson facility apparently caused some confusion

CHAPMAN AND CUTLER

Ms. Nola Hicks
September 24, 1986
Page 2

at the IEPA and generated additional activity in their review. These matters became part of our consideration in determining whether to agree to a settlement amount.

We understand from your presentation that you have proposed a settlement amount of \$35,000.00 for the two facilities based upon the computation worksheet completed by your office. After reviewing the matters raised during our settlement conference, we determined that we would be willing to agree to a settlement amount, and we believed \$3,750.00 was a fair and reasonable settlement amount. Of this total, we allocated \$1,750.00 to the Chicago facility and \$2,000.00 to the Robinson facility. Our response considered the factual matters raised during our conference and was made with reference to the policy matrix distributed by the USEPA which considers the extent of deviation and the potential for harm.

As we discussed at the conference, at this time we are far apart on an agreement as to the settlement amount. The original amount proposed by the USEPA, however, was determined without regard to the factual matters we presented at the settlement conference. Our difference may become smaller, and the opportunity for settlement greater, if the settlement amount is recomputed in view of the facts discussed. For example, liability insurance has been in effect since June 1, 1985, almost two weeks prior to the deadline set at the pre-enforcement conference. Thus, if this issue is considered moot, and the settlement amount recalculated, that would remove \$19,000.00 from the USEPA proposal. Moreover, that change in the amount would not be due to adjustments arising from the settlement conference, but rather because the factual issues raised in the complaints were resolved. Obviously, if the proposed penalty is recalculated based upon the new facts which have come to light since the filing of the complaints, our difference in settlement amounts will become much less. In turn, we will review the factual matters discussed at the settlement conference with a view toward whether we should be more flexible in our discussions of the settlement amounts.

Finally, this letter confirms our conference call on Friday, October 3, 1986 at 3:00 p.m. to further discuss settlement of these proceedings. As we discussed, you will call this office at 845-3874, and we will have representatives of the respondent available.

Very truly yours,

CHAPMAN AND CUTLER

By 

James P. O'Brien

JPO/jp

Enclosures

cc: Lisa Grigsby, Esq.
Mr. Nick Malone
Gabriel & Associates

SETTLEMENT CONFERENCE

NAME DONA - Corporation & Chicago & Robinson Plant
DATE September 23, 1986
SUBJECT _____

SUMMARY OF CONFERENCE On September 23, 1986, the attendees, participated in an informal Settlement Conference regarding the Dona Corporations. Dona was cited for not having financial Insurance and Assurance and Not having an adequate Closure Plan. These violations were addressed to us through a referral from the IEPA.

Dona - Chicago

- Respondent provided us with a copy of liability Insurance for Sudden coverage, effective June 25, 1985. Also with financial Assurance for closure. The Closure Plan was submitted and Approved by IEPA.

Dona - Robinson

- Sudden liability coverage ^{and Assurance} ~~were~~ submitted w/ Dona - Chicago Submitted therefore effective June 25, 1985. There were some problems with the timeliness of Dona - Robinson's Closure Plan submitted. According to Dona - Robinson facility, the Closure plan was submitted on the same day as the Dona - Chicago closure plan.

One area of concern is the present of post closure costs for the Robinson plant. The facility claims that they do not operate nor have they operated a LDF at this site. They are going to check with facility on why post closure cost was included on the letter from the Chief Financial Office. Another area of concern is what type of liability insurance coverage did Dona apply for? On their

SETTLEMENT CONFERENCE

NAME Dana Corporation

DATE _____

SUBJECT _____

SUMMARY OF CONFERENCE Certificate of Liability Insurance, Dana
didn't mark what type of coverage they were applying for.

Things to be done

1. Dana will:

- a) Make sure the appropriate liability coverage is in place for each facility;
- b) Make sure that post closure cost and non-sudden liability coverage is not needed.

2. USEPA will:

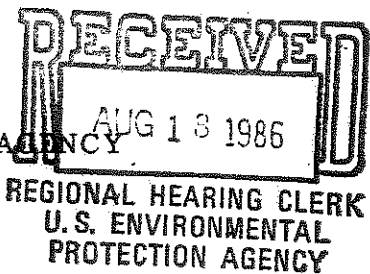
- a) Check w/ IEPA on Surface Impoundment Issue.
- b) Send Gabriel and Associates a Part A package

9-23-86

Settlement Conference for Dana Corporation

Olin L. Wamsley	Region II, HWER	(312) 886-6533
Andrew Vollenwe	IEPA	217-782-9884
Bar Filson	TEPA	217/785-8447
N.J. Malone	GABRIEL & ASSOCIATES	312 486 2123
Lisa Grigsby	Dana Corp.	419-535-4675
Jim O'Brien	Chapman and Cutler,	(312) 845-3874
Pol A. N. Hicks	U.S. EPA	(312) 886-6833

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V



IN THE MATTER OF:

DANA CORPORATION,
VICTOR PRODUCTS DIVISION
SOUTH EATON ROAD
ROBINSON, ILLINOIS 62454
ILD 047 074 661

DOCKET NO. V-W-86-R-54

ANSWER AND REQUEST FOR HEARING

Dana Corporation, Victor Products Division ("Respondent"), by its attorneys, answers the Complaint of the United States Environmental Protection Agency ("Complainant") as follows:

PREAMBLE

This Complaint and Compliance Order is filed pursuant to Section 3008(a)(1) of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6928(a)(1), and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director of the Waste Management Division, Region V, United States Environmental Protection Agency (hereinafter U.S. EPA). The Respondent states that Dana Corporation is located at South Eaton Road, Robinson, Illinois.

RESPONSE: Respondent admits that the Respondent is Dana Corporation, Victor Products Division, and the Respondent admits the remaining allegations of the first unnumbered paragraph of the Preamble.

This Complaint and Compliance Order is based on information available to U.S. EPA through a referral submitted by the Illinois Environmental Protection Agency (IEPA) dated February 10, 1986, and on record reviews conducted by IEPA in its offices. Based upon information contained in U.S. EPA's files and record reviews conducted by IEPA, violations of applicable Federal and State regulations have been identified.

RESPONSE: Respondent denies violations of applicable Federal and State regulations have been identified, and Respondent is without knowledge as to the remaining allegations of the second unnumbered paragraph of the Preamble.

Pursuant to Section 3008(a)(1) of RCRA, 42 U.S.C. §6928(a)(1), and based on information obtained during the record reviews and file review, it has been determined that the Respondent is in violation of Subtitle C of RCRA, Section 3004, and the Illinois Environmental Protection Act, Ill. Rev. Stat. 1982, Ch. 111-1/2, 1001 et seq., as amended and regulations adopted by the Illinois Pollution Control Board, including 35 Ill. Adm. Code 725.212, 725.242, 725.243 and 725.247

RESPONSE: Respondent denies the allegations of the third unnumbered paragraph of the Preamble.

JURISDICTION

Jurisdiction for this action is conferred upon U.S. EPA by Sections 1006(a), 2002(a)(1), 3006(b) and 3008(a)(2) of RCRA; 42 U.S.C. §§6905(a)(1), 6926(b) and 6928(a)(2), respectively.

RESPONSE: Respondent admits the allegations of the first unnumbered paragraph of the Jurisdiction.

On May 17, 1982, the State of Illinois was granted Phase I Interim Authorization by the Administrator of U.S. EPA pursuant to Section 3006(b) of RCRA, 42 U.S.C. §6926(b), to administer a hazardous waste program in lieu of the Federal program. See 47 Fed. Reg. 21,043 (1982). On January 31, 1986, the State of Illinois was granted final authorization. As a result, facilities in Illinois qualifying for interim status under 40 CFR 270.70 are regulated under the Illinois provisions found at 35 Ill. Adm. Code Part 720 et seq. rather than the Federal regulations set forth at 40 CFR Part 265. Section 3008(a)(2) of RCRA, 42 U.S.C. §6928(a)(2), provides that U.S. EPA may enforce State regulations in those States authorized to administer a hazardous waste program.

RESPONSE: Respondent is without knowledge as to the allegations of the second unnumbered paragraph of Jurisdiction.

DETERMINATIONS

1. Section 3010 of RCRA, 42 U.S.C. §6930, requires any person who generates or transports hazardous waste, or who owns or operates a facility for the treatment, storage or disposal of hazardous waste to notify U.S. EPA of such activity within 90 days of the promulgation of regulations under Section 3001 of RCRA. Section 3010 of RCRA also provides that no hazardous waste subject to U.S. EPA regulation may be transported, treated, stored, or disposed of unless the required notification has been given.

RESPONSE: Respondent admits the allegations of paragraph 1.

2. U.S. EPA promulgated regulations concerning the generation, transportation, and treatment, storage or disposal of hazardous waste on May 19, 1980. These regulations are codified at 40 CFR Parts 260 through 265. Notification to U.S. EPA of hazardous waste handling activity was required in most instances no later than August 18, 1980.

RESPONSE: Respondent admits the allegations of paragraph 2.

3. Section 3005 of RCRA requires U.S. EPA to promulgate regulations requiring each person owning or operating a hazardous waste treatment, storage or disposal facility to obtain a RCRA permit. Such regulations were promulgated on May 19, 1980, and are codified at 40 CFR Parts 270 and 271 (formerly Parts 122 and 123). The regulations require persons who treat, store, or dispose of hazardous waste to submit Part A of the permit application in most instances no later than November 19, 1980.

RESPONSE: Respondent admits the allegations of paragraph 3.

4. Section 3005(e) of RCRA provides that an owner or operator of a facility shall be treated as having been issued a permit pending final administrative disposition of the permit application provided that: (1) the facility was in existence on November 19, 1980; (2) the requirements of Section 3010(a) of RCRA concerning the notification of hazardous waste handling activity have been complied with; and (3) application for a permit has been made. This statutory authorization to operate, pending final action on the permit, is known as interim status. U.S. EPA regulations implementing these provisions are found at 40 CFR Part 270.

RESPONSE: Respondent admits the allegations of paragraph 4.

5. On and subsequent to November 19, 1980, Respondent has owned and operated a facility located at South Eaton Road, Robinson, Illinois 62454. Respondent is a Virginia corporation whose registered agent is the C.T. Corporation, 208 S. LaSalle, Chicago, Illinois.

RESPONSE: The Respondent admits the allegations of paragraph 5.

6. On July 29, 1980, Respondent submitted a notification of hazardous waste handling activity for its facility at South Eaton Road, as required by Section 3010(a) of RCRA.

RESPONSE: Respondent admits the allegations of paragraph 6.

7. On November 5, 1980, Respondent filed a RCRA Part A permit application as required by Section 3005(a) of RCRA and 40 CFR 270.1(b), to store hazardous waste at the South Eaton Road facility. The Part A permit application indicated the facility consists of container storage of toxic wastes as defined in 40 CFR 261.33(f) (Hazardous Waste Numbers U013, U154, U220, and U021).

RESPONSE: The respondent admits the allegations of paragraph 7.

8. On December 21, 1984, the IEPA issued a Compliance Inquiry Letter (CIL) to Respondent regarding the financial assurance and closure deficiencies identified in Respondent's closure plan. The Respondent's deficiencies are listed below:

- a. Failure to provide financial assurance as required by 35 Ill. Adm. Code 725.243, (40 CFR 265.143). All owners or operators of each facility must establish financial assurance for closure of the facility; and

- b. Failure to submit a closure plan and cost estimates as required under 35 Ill. Adm. Code 725.174, (40 CFR 265.74). All records, including plans required under this part must be furnished upon request.

RESPONSE: Respondent admits that the Illinois Environmental Protection Agency ("IEPA") issued a Compliance Inquiry Letter (CIL) on December 21, 1984 concerning the subject matter alleged in paragraph 8, but the Respondent denies the remaining allegations of paragraph 8.

9. On January 24, 1985, Respondent submitted its revised closure plan to IEPA. *ex 2*

RESPONSE: Respondent admits the allegations of paragraph 9.

10. On February 14, 1985, IEPA reviewed and commented to Respondent on the revised closure plan. The deficiencies noted in the review were related to Respondent and are listed below:

- a. The closure plan does not give an estimated year of closure or a schedule for final closure as required by 35 Ill. Adm. Code 725.212(a)(4), (40 CFR 265.112(a)(4)). An estimate of the expected year of closure and a schedule for final closure must be provided;
- b. The closure plan does not give the steps necessary to decontaminate facility equipment as required by 35 Ill. Adm. Code 725.212(a)(3), (40 CFR 265.112(a)(3)). A description of the steps necessary to decontaminate facility equipment during closure must be provided;
- c. The step of certification is not given as required by 35 Ill. Adm. Code 725.215, (40 CFR 265.115). When closure is completed, the owner or operator must submit to the Director certification by both the owner or operator and by an independent registered certified engineer that the facility has been closed in accordance with the specifications in the approved closure plan; and
- d. The closure cost estimate is not itemized step by step as required by 35 Ill. Adm. Code 725.242, (40 CFR 265.142). The owner or operator must prepare a written estimate, in current dollars, of the cost of closing the facility in accordance with the closure plan.

RESPONSE: Respondent admits that the IEPA reviewed and commented to Respondent on the revised closure plan on or about February 14, 1985, and those comments concerned the subject matter of the averments in paragraph 10, but the Respondent denies the remaining allegations of paragraph 10.

11. On February 14, 1985, IEPA reviewed and commented to Respondent, on the revised financial responsibility requirements. The deficiency noted in the review was related to Respondent and is listed below:

Sudden liability insurance was not furnished as required by 35 Ill. Adm. Code 725.247, (40 CFR 265.147). The owner or operator must have and maintain liability insurance coverage for sudden accidental occurrences in the amount of at least one million dollars per occurrence with an annual aggregate of at least two million dollars.

RESPONSE: Respondent admits that the IEPA reviewed and commented to Respondent on the revised closure plan on or about February 14, 1985, and those comments concerned the subject matter of paragraph 11, but Respondent denies the remaining allegations of paragraph 11.

12. On April 10, 1985, a Pre-Enforcement Conference Letter (PECL) was sent to Respondent by IEPA setting forth the deficiencies and regulatory violations which existed in items Number 10 and 11. The pre-enforcement conference was scheduled and held May 21, 1985.

RESPONSE: Respondent admits that a pre-enforcement conference letter was sent to Respondent on or about April 10, 1985, the subject matter of which concerned paragraph 12, and that a pre-enforcement conference was scheduled and held on May 21, 1985, but Respondent denies the remaining allegations of paragraph 12.

13. As a result of the May 21, 1985, pre-enforcement conference, Respondent was directed to submit an adequate closure plan and financial responsibility information by June 10, 1985.

RESPONSE: Respondent admits that as a result of the May 21, 1985 pre-enforcement conference, Respondent agreed to submit additional information regarding the closure plan and financial responsibility, but Respondent denies the remaining allegations of paragraph 13. Respondent affirmatively states that additional information was to be submitted by July 12, 1985. ✓

14. Respondent submitted updated information regarding its liability coverage and closure cost estimates on June 25, 1985.

RESPONSE: Respondent admits the allegations of paragraph 14.

15. On July 9, 1985, IEPA reviewed the Respondent's liability coverage and closure cost estimates for the facility and found them to be deficient pursuant to 35 Ill. Adm. Code 725.247, (40 CFR 265.147) and 35 Ill. Adm. Code 725.242 (40 CFR 265.142). The financial responsibility and closure cost estimate deficiencies are listed below:

- a. The financial test alternative II has not been signed; *exhibit H 11*
- b. Failure to submit the estimated year of closure; and
- c. Failure to provide information as requested in Determinations Number 10 (Closure Plan) b, c, d, and 11 (Financial Responsibility).

RESPONSE: Respondent has no knowledge of the date on which the IEPA undertook its review, and Respondent denies the remaining allegations of paragraph 15. Respondent affirmatively states that proof of liability coverage has been submitted.

16. On July 10, 1985, consultant for the Respondent, Gabriel and Associates, sent a letter to the IEPA in which an extension of the closure plan submissions deadline was requested; IEPA denied the request. *Aug 14, CP submitted*

RESPONSE: The Respondent denies the allegations of paragraph 16.

17. On August 19, 1985, the revised closure plan was received by the IEPA.

RESPONSE: Respondent has no knowledge as to the date the revised closure plan was received by the IEPA, but Respondent affirmatively states that such plan was sent on or about August 19, 1985.

18. On November 14, 1985, IEPA sent a notice of deficiencies to Respondent outlining non-compliance with the interim standards of 35 Ill. Adm. Code 725, Subtitles G and H. *Exhibit H, 15*

RESPONSE: Respondent admits receiving a notice of deficiencies from the IEPA on or about November 14, 1985, but Respondent denies the remaining allegations of paragraph 18. *12-12-85 CP revised*

19. On February 14, 1986, IEPA received the revised closure plan.

RESPONSE: Respondent has no knowledge as to the date on which the IEPA received the revised closure plan, but Respondent affirmatively states it sent a revised closure plan on or about December 12, 1985.

20. On May 14, 1986, IEPA approved the closure plan. Under the terms of this approval, certification of closure must be received no later than September 12, 1986.

RESPONSE: Respondent admits the allegations of paragraph 20.

WHEREFORE, Respondent objects to the \$21,500 civil penalty proposed in the Complaint.

CHAPMAN AND CUTLER

BY: _____
James P. O'Brien
Attorney for Dana Corporation,
Victor Products Division

DATED: _____

CHAPMAN AND CUTLER
111 West Monroe Street
Chicago, Illinois 60603
(312) 845-3000

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:

DANA CORPORATION
VICTOR PRODUCTS DIVISION
SOUTH EATON ROAD
ROBINSON, ILLINOIS 62454
IDL 047 074 661

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)
)
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DOCKET NO. V-W-86-R-54

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on August 18, 1986, he filed the original of the attached Answer and Request for Hearing, Notice of Appearance and Notice of Filing with the Regional Hearing Clerk and hand-delivered a copy to Nola Hicks, Office of Regional Counsel, U.S. Environmental Protection Agency, 230 South Dearborn Street, Chicago, Illinois 60604.

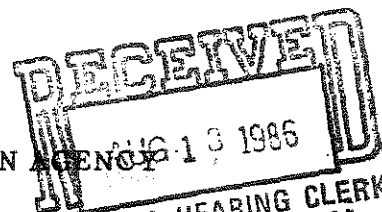
CHAPMAN AND CUTLER

BY:


James P. O'Brien
Attorney for Dana Corporation,
Victor Products Division

CHAPMAN AND CUTLER
111 West Monroe Street
Chicago, Illinois 60603
(312) 845-3000

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V



IN THE MATTER OF:)

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VICTOR PRODUCTS DIVISION)
SOUTH EATON ROAD)
ROBINSON, ILLINOIS 62454)
IDL 047 074 661)

DOCKET NO. V-W-86-R-54

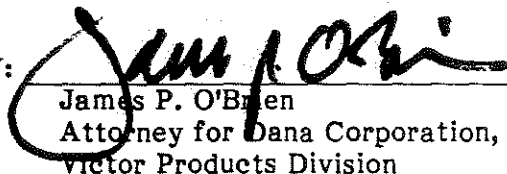
NOTICE OF APPEARANCE

TO: Nola Hicks, Esq.
Office of Regional Counsel
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

PLEASE TAKE NOTICE that on behalf of Dana Corporation, Victor Products Division, Chapman and Cutler hereby enters its Appearance as counsel herein.

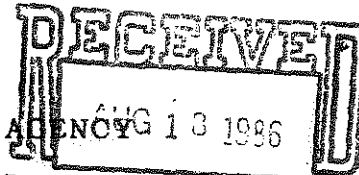
CHAPMAN AND CUTLER

BY:


James P. O'Brien
Attorney for Dana Corporation,
Victor Products Division

CHAPMAN AND CUTLER
111 West Monroe Street
Chicago, Illinois 60603
(312) 845-3000

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V



IN THE MATTER OF:)

DANA CORPORATION)
VICTOR PRODUCTS DIVISION)
SOUTH EATON ROAD)
ROBINSON, ILLINOIS 62454)
IDL 047 074 661)

DOCKET NO. V-W-86-R-54

REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY

NOTICE OF FILING

TO: Nola Hicks, Esq.
Office of Regional Counsel
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Robert M. Andersen
Regional Judicial Officer
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

PLEASE TAKE NOTICE that on behalf of Dana Corporation, Victor Products Division, I have this 18th day of August, 1986 filed with the Regional Hearing Clerk the Answer and Request for Hearing, a copy of which is attached hereto.

CHAPMAN AND CUTLER

BY: _____

James P. O'Brien
Attorney for Dana Corporation,
Victor Products Division

CHAPMAN AND CUTLER
111 West Monroe Street
Chicago, Illinois 60603
(312) 845-3000

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

RECEIVED
AUG 18 1986
REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY

IN THE MATTER OF:)

DANA CORPORATION)
VICTOR PRODUCTS DIVISION)
SOUTH EATON ROAD)
ROBINSON, ILLINOIS 62454)
IDL 047 074 661)

DOCKET NO. V-W-86-R-54

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U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Robert M. Andersen
Regional Judicial Officer
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

PLEASE TAKE NOTICE that on behalf of Dana Corporation, Victor Products Division, Chapman and Cutler hereby enters its Appearance as counsel herein.

CHAPMAN AND CUTLER

BY: _____

James P. O'Brien
Attorney for Dana Corporation,
Victor Products Division

CHAPMAN AND CUTLER
111 West Monroe Street
Chicago, Illinois 60603
(312) 845-3000

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:

DANA CORPORATION
VICTOR PRODUCTS DIVISION
SOUTH EATON ROAD
ROBINSON, ILLINOIS 62454
IDL 047 074 661

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DOCKET NO. V-W-86-R-54

NOTICE OF FILING

TO: Nola Hicks, Esq.
Office of Regional Counsel
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

PLEASE TAKE NOTICE that on behalf of Dana Corporation, Victor Products Division, I have this 18th day of August, 1986 filed with the Regional Hearing Clerk the Answer and Request for Hearing, a copy of which is attached hereto.

CHAPMAN AND CUTLER

BY:


James P. O'Brien
Attorney for Dana Corporation,
Victor Products Division

CHAPMAN AND CUTLER
111 West Monroe Street
Chicago, Illinois 60603
(312) 845-3000

5HE-12 RCRA WARNSLEY
P 611 587 574

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

R. FRASKE (See Reverse)

★ U.S.G.P.O. 1983-403-517

Sent to	/ Dana Corp
Victor PROD Div.	
Street and No.	5700 W. Roosevelt Rd
P.O., State and ZIP Code	Chicago, IL 60690
Postage	\$39
Certified Fee	75
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	70
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$1.84
Postmark or Date	

PS Form 3800, Feb. 1982



5HE-12 WARNSLEY
P 611 587 573

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

★ U.S.G.P.O. 1983-403-517

Sent to	C. T. Corp. System
Agent for Dana Corp	
Street and No.	208 S. LaSalle St.
P.O., State and ZIP Code	Chicago, IL 60604
Postage	\$2.40
Certified Fee	75
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	70
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$3.85
Postmark or Date	

PS Form 3800, Feb. 1982



PS Form 3811, July 1983 447-845

SENDER: Complete items 1, 2, 3 and 4.
Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. ☐ Show to whom, date and address of delivery.
2. ☐ Restricted Delivery.

3. Article Addressed to:
C.T. Corp. System Agent for
DANA Corp.
208 S. LaSalle St
Chicago, IL 60604

4. Type of Service: Article Number
☐ Registered ☐ Insured
☐ Certified ☐ COD
☐ Express Mail
P 611 587 573

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature — Addressee **CT Corporation System**
X
208 S. LaSalle Street
Chicago, Illinois 60604

6. Signature — Agent
X

7. Date of Delivery **6-19**

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

PS Form 3811, July 1983 447-845

SENDER: Complete items 1, 2, 3 and 4.
Put your address in the "RETURN TO" space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for service(s) requested.

1. ☐ Show to whom, date and address of delivery.
2. ☐ Restricted Delivery.

3. Article Addressed to:
R. FRASKE / DANA Corp /
Victor Prod. Division
5700 W. Roosevelt Rd.
Chicago, IL 60690

4. Type of Service: Article Number
☐ Registered ☐ Insured
☐ Certified ☐ COD
☐ Express Mail
P 611 587 574

Always obtain signature of addressee or agent and **DATE DELIVERED.**

5. Signature — Addressee
X

6. Signature — Agent **Andy Tate**
X

7. Date of Delivery **6-17-86**

8. Addressee's Address (ONLY if requested and fee paid)

DOMESTIC RETURN RECEIPT

UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

RETURN
TO



PENALTY FOR PRIVATE
USE, \$300

5HE-12
RCRA
Warnsley

United States
Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

No.)

UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS

SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

RETURN
TO



PENALTY FOR PRIVATE
USE, \$300

5HE-12
RCRA
Warnsley

United States
Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

5HE-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

C. T. Corporation System,
Registered Agent for
Dana Corporation
208 South LaSalle Street
Chicago, Illinois 60604

Re: Complaint, Findings of Violation
and Compliance Order
EPA I.D. No: ILD 068 469 386

Dear Sir/Madam:

Enclosed please find a Complaint, Findings of Violations and Compliance Order which specifies this Agency's determination of certain violations by your company of the Resource Conservation and Recovery Act (RCRA) as amended, 42 U.S.C. §6901 et seq. This Agency's determination is based on record reviews conducted by the Illinois Environmental Protection Agency and on information in our files about your facility at 5750 W. Roosevelt Road, Chicago, Illinois 60690.

Accompanying the Complaint and Compliance Order is a Notice of Opportunity for Hearing. Should you desire to contest the Complaint or penalty, a written request for a hearing is required to be filed with Ms. Beverly Shorty, Regional Hearing Clerk at U.S. EPA, 230 S. Dearborn Street, Chicago, Illinois 60604, within thirty (30) days from receipt of this Compliance Order. A copy of your request should be sent to Ms. Nola Hicks, Assistant Regional Counsel (5C-16), U.S. EPA, at the above address.

PK 5-29-86
mlh 6-3-86
RH 5/29/86

CONCURRENCES

SYMBOL	EP4 #1					
SURNAME	D.R.	WEM	ap	WEM	mlh	WMB
DATE	5/20/86	5-21-86	5-23-86	5-27-86	5/28/86	6/11/86



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF

5HE-12

⁶
JUN 13 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

C. T. Corporation System,
Registered Agent for
Dana Corporation
208 South LaSalle Street
Chicago, Illinois 60604

Re: Complaint, Findings of Violation
and Compliance Order
EPA I.D. No: ILD 068 469 386

Dear Sir/Madam:

Enclosed please find a Complaint, Findings of Violation and Compliance Order which specifies this Agency's determination of certain violations by your company of the Resource Conservation and Recovery Act (RCRA) as amended, 42 U.S.C. §6901 et seq. This Agency's determination is based on record reviews conducted by the Illinois Environmental Protection Agency and on information in our files about your facility at 5750 W. Roosevelt Road, Chicago, Illinois 60690.

Accompanying the Complaint and Compliance Order is a Notice of Opportunity for Hearing. Should you desire to contest the Complaint or penalty, a written request for a hearing is required to be filed with Ms. Beverly Shorty, Regional Hearing Clerk at U.S. EPA, 230 S. Dearborn Street, Chicago, Illinois 60604, within thirty (30) days from receipt of this Compliance Order. A copy of your request should be sent to Ms. Nola Hicks, Assistant Regional Counsel (5C-16), U.S. EPA, at the above address.

If you have any questions, or desire to request an informal conference for the purpose of settlement, please contact Mr. Oliver L. Warnsley, Waste Management Division, U.S. EPA, 230 S. Dearborn Street, Chicago, Illinois 60604. Mr. Warnsley may be reached at (312) 886-6533.

Sincerely,

m.a. Galt

fr Basil G. Constantelos, Director
Waste Management Division

Enclosures

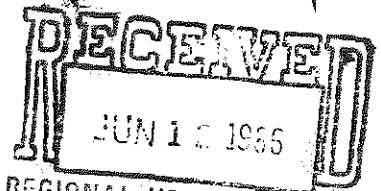
cc: William Radlinski
IEPA-Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

R. Friske
Dana Corporation-Victor Products Division
5750 W. Roosevelt Road
Chicago, Illinois 60690

Glenn Savage
IEPA-Division of Land Pollution Control
Field Operations Section
2200 Churchill Road
Springfield, Illinois 62706

Gary P. King
Senior Attorney
Enforcement Programs
IEPA
200 Churchill Road
Springfield, Illinois 62706

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V



IN THE MATTER OF:

DANA CORPORATION,
VICTOR PRODUCT DIVISION
5750 W. ROOSEVELT ROAD
CHICAGO, ILLINOIS 60690
ILD 068 469 386

DOCKET NO.

COMPLAINT, FINDINGS OF VIOLATION
AND COMPLIANCE ORDER

REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCY

PREAMBLE

V--W- 83 R- 49

This Complaint and Compliance Order is filed pursuant to Section 3008(a)(1) of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6928(a)(1), and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director of the Waste Management Division, Region V, United States Environmental Protection Agency (hereinafter U.S. EPA). The Respondent is Dana Corporation located at 5750 W. Roosevelt Road, Chicago, Illinois.

This Complaint and Compliance Order is based on information available to U.S. EPA through a referral submitted by the Illinois Environmental Protection Agency (IEPA) dated February 10, 1986, and on record reviews conducted by IEPA in its offices. Based upon information contained in U.S. EPA's files and record reviews conducted by IEPA, violations of applicable Federal and State regulations have been identified.

Pursuant to Section 3008(a)(1) of RCRA, 42 U.S.C. §6928(a)(1), and based on information obtained during the record reviews and file review, it has been determined that the Respondent is in violation of Subtitle C of RCRA, Section

3004, and the Illinois Environmental Protection Act, Ill. Rev. Stat. 1982, Ch. 111-1/2, 1001 et seq., as amended and regulations adopted by the Illinois Pollution Control Board, including 35 Ill. Adm. Code 725.243 and 725.247.

JURISDICTION

Jurisdiction for this action is conferred upon U.S. EPA by Sections 1006(a), 2002(a)(1), 3006(b) and 3008(a)(2) of RCRA; 42 U.S.C. §§6905(a)(1), 6926(b) and 6928(a)(2), respectively.

On May 17, 1982, the State of Illinois was granted Phase I Interim Authorization by the Administrator of U.S. EPA pursuant to Section 3006(b) of RCRA, 42 U.S.C. §6926(b), to administer a hazardous waste program in lieu of the Federal program. See 47 Fed. Reg. 21,043 (1982). On January 31, 1986, the State of Illinois was granted final authorization. As a result, facilities in Illinois qualifying for interim status under 40 CFR 270.70 are regulated under the Illinois provisions found at 35 Ill. Adm. Code Part 720 et seq. rather than the Federal regulations set forth at 40 CFR Part 265. Section 3008(a)(2) of RCRA, 42 U.S.C. §6928(a)(2), provides that U.S. EPA may enforce State regulations in those States authorized to administer a hazardous waste program.

DETERMINATIONS

1. Section 3010 of RCRA, 42 U.S.C. §6930, requires any person who generates or transports hazardous waste, or who owns or operates a facility for the treatment, storage or disposal of hazardous waste to notify U.S. EPA of such activity within 90 days of the promulgation of regulations under Section 3001 of RCRA, 42 U.S.C. §6921. Section 3010 of RCRA also provides

that no hazardous waste subject to U.S. EPA regulation may be transported, treated, stored, or disposed of unless the required notification has been given.

2. U.S. EPA promulgated regulations concerning the generation, transportation, and treatment, storage or disposal of hazardous waste on May 19, 1980. These regulations are codified at 40 CFR Parts 260 through 265. Notification to U.S. EPA of hazardous waste handling activity was required in most instances no later than August 18, 1980.

3. Section 3005 of RCRA, 42 U.S.C. §6925, requires U.S. EPA to promulgate regulations requiring each person owning or operating a hazardous waste treatment, storage or disposal facility to obtain a RCRA permit. Such regulations were promulgated on May 19, 1980, and are codified at 40 CFR Parts 124, 270 and 271. The regulations require persons who treat, store, or dispose of hazardous waste to submit Part A of the permit application in most instances no later than November 19, 1980.

4. Section 3005(e) of RCRA, 42 U.S.C. §6925(e), provides that an owner or operator of a facility shall be treated as having been issued a permit pending final administrative disposition of the permit application provided that: (1) the facility was in existence on November 19, 1980; (2) the requirements of Section 3010(a) of RCRA, 42 U.S.C. §6930(a), concerning the notification of hazardous waste handling activity have been complied with; and (3) application for a permit has been made. This statutory authorization to operate, pending final action on the permit, is known as interim status. U.S. EPA regulations implementing these provisions are found at 40 CFR Part 270.

5. On and subsequent to November 19, 1980, Respondent has owned and operated a facility located at 5750 W. Roosevelt Road, Chicago, Illinois 60690. Respondent is a Virginia corporation whose registered agent is the C. T. Corporation, 208 S. LaSalle, Chicago, Illinois.

6. On June 25, 1980, Respondent submitted a notification of hazardous waste handling activity for its facility at 5750 W. Roosevelt Road as required by Section 3010(a) of RCRA, 42 U.S.C. §6930(a).

7. On November 12, 1980, Respondent filed a RCRA Part A permit application as required by Section 3005(a) of RCRA, 42 U.S.C. §6925(a) and 40 CFR 270.1 (b), to store hazardous waste at the 5750 W. Roosevelt Road facility. The Part A permit application indicated the facility consists of container storage of toxic and ignitable wastes as defined in 40 CFR 261.31 and 261.33(f) (Hazardous Waste Numbers F001, F003, F005 and U171).

8. On December 21, 1984, the IEPA issued a Compliance Inquiry letter (CIL) to Respondent regarding the financial assurance and closure deficiencies identified in Respondent's closure plan. The Respondent's deficiencies are listed below:

- a. Failure to provide financial assurance as required by 35 Ill. Adm. Code 725.243, (40 CFR 265.143). All owners or operators of each facility must establish financial assurance for closure of the facility; and
- b. Failure to submit a closure plan and cost estimates as requested under 35 Ill. Adm. Code 725.174, (40 CFR 265.74). All records, including plans required under this part must be furnished upon request.

9. On January 24, 1985, Respondent submitted its revised closure plan to IEPA.

10. On February 14, 1985, IEPA reviewed and commented to Respondent, on the revised closure plan. The deficiencies noted in the review were related to Respondent and are listed below:

- a. The closure plan failed to describe how the requirements of 35 III. Adm. Code 725.211, (40 CFR 265.111) would be met as required by 35 III. Adm. Code 725.212. The owner or operator must close his facility in a manner that: 1) minimizes the need for further maintenance; and 2) controls, minimizes or eliminates, to the extent necessary to protect human health and environment, post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall or waste decomposition products to the ground or surface waters or to the atmosphere;
- b. The closure plan does not give an estimated year of closure or a schedule for final closure as required by 35 III. Adm. Code 725.212(a)(4), (40 CFR 265.112(a)(4)). An estimate of the expected year of closure and a schedule for final closure must be provided;
- c. The closure plan does not give the tank sizes and the maximum inventory of wastes as required by 35 III. Adm. Code 725.212(a), (40 CFR 265.112(a)(2)). An estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility must be provided;
- d. The closure plan does not give the steps necessary to decontaminate the facility as required by 35 III. Adm. Code 725.212(a)(3), (40 CFR 265.112(a)(3)). A description of the steps necessary to decontaminate facility equipment during closure must be provided.

- e. The step of certification is not given as required by 35 Ill. Adm. Code 725.215, (40 CFR 265.115). When closure is completed, the owner or operator must submit to the Director certification by both the owner or operator and by an independent registered certified engineer that the facility has been closed in accordance with the specifications in the approved closure plan; and
 - f. The closure cost estimate is not provided as required by 35 Ill. Adm. Code 725.242, (40 CFR 265.142). The owner or operator must prepare a written estimate, in current dollars, of the cost of closing the facility in accordance with the closure plan.
11. On February 14, 1985, IEPA reviewed and commented to Respondent, on the revised financial responsibility requirements. The deficiencies noted in the review were related to Respondent and are listed below:
- a. The U.S. EPA I.D. Number listed on the letter from the chief financial officer is incorrect; and
 - b. Sudden liability insurance was not provided as required by 35 Ill. Adm. Code 725.247, (40 CFR 265.147). The owner or operator must have and maintain liability insurance coverage for sudden accidental occurrences in the amount of at least one million dollars per occurrence with an annual aggregate of at least two million dollars.
12. On April 10, 1985, a Pre-Enforcement Conference Letter (PECL) was sent to Respondent by IEPA setting forth the deficiencies and regulatory violations which existed in items number 10 and 11. The pre-enforcement conference was scheduled and held May 21, 1985.

13. As a result of the May 21, 1985, pre-enforcement conference, Respondent was directed to submit an adequate closure plan and financial responsibility information by June 10, 1985.

14. Respondent submitted updated information regarding its liability coverage and closure cost estimates on June 25, 1985.

15. On July 9, 1985, IEPA reviewed the Respondent's liability coverage and closure cost estimates for the facility and found them to be deficient pursuant to 35 Ill. Adm. Code 725.247, (40 CFR 265.147) and 35 Ill. Adm. Code 725.242, (40 CFR 265.142). The financial responsibility and closure cost estimate deficiencies are listed below:

- a. The financial test alternative II has not been signed;
- b. Failure to provide an estimated year of closure; and
- c. Failure to provide information as requested in Determinations Number 10 (Closure Plan) c, d, e, f, and Number 11 (Financial Responsibility) b.

16. On July 10, 1985, the consultant for Respondent, Gabriel and Associates, sent a letter to the IEPA in which an extension of the closure plan submission deadline was requested; IEPA denied the request.

17. On August 19, 1985, the revised closure plan was received by the IEPA.

18. On November 13, 1985, IEPA sent a notice of deficiencies to Respondent outlining non-compliance with the interim standards of 35 Ill. Adm. Code 725, Subtitles G and H.

19. On February 13, 1986, IEPA approved the revised closure plan. However, the financial requirement violations are still outstanding.

ORDER

Respondent having been initially determined to be in violation of Section 3004 of RCRA and 35 Ill. Adm. Code Part 725, the following Compliance Order Pursuant to Section 3008(a)(1) of RCRA, 42 U.S.C. §6928(a)(1), is entered:

A. Respondent shall, within 30 days of receipt of this Order, cease all treatment, storage or disposal of hazardous waste except such treatment and storage at the facility as shall be in complete compliance with the applicable requirements of 35 Ill. Adm. Code Subtitles G and H.

B. Respondent shall, within thirty (30) days of receipt of this Order, comply with the following requirements:

1. Submit to IEPA all necessary documents for providing financial assurance for closure, as required by 35 Ill. Adm. Code 725.243.
2. Submit to IEPA proof of sudden liability insurance coverage to meet the liability requirements of 35 Ill. Adm. Code 725.247.

C. Respondent shall notify U.S. EPA in writing upon achieving compliance with this Order or any part thereof. This notification shall be submitted not later than forty-five (45) days from receipt of this Order to the U.S. EPA, Region V, Waste Management Division, 230 South Dearborn Street, Chicago, Illinois 60604, Attention: RCRA Enforcement Section.

Notwithstanding any other provision of this Order, an enforcement action may be brought pursuant to Section 7003 of RCRA, 42 U.S.C. §6973, or any other applicable statutory authority, should U.S. EPA find that the handling, storage, treatment, transportation, or disposal of solid or hazardous waste at the facility may present an imminent and substantial endangerment to human health or the environment.

ASSESSMENT OF PENALTY

Based upon the violations cited herein, and pursuant to Section 3008(c) and (g) of RCRA, 42 U.S.C. §6928(c) and (g), U.S. EPA assesses a penalty of THIRTEEN THOUSAND FIVE HUNDRED DOLLARS (\$13,500) against the Respondent. The proposed penalty has been set at the indicated level based upon an analysis of the seriousness of the violations cited herein and the conduct of the Respondent. Payment shall be submitted within sixty (60) days of entry of this Order in the form of a certified or cashier's check made payable to the Treasury of the United States of America, and shall be remitted to the U.S. EPA, P.O. Box 70753, Chicago, Illinois 60673. A copy of the transmittal payment should also be submitted to Ms. Beverly Shorty, Regional Hearing Clerk, Planning and Management Division, 230 S. Dearborn Street, Chicago, Illinois 60604 and to the SWERB Secretary, Office of Regional Counsel, 230 S. Dearborn Street, Chicago, Illinois 60604. Failure to comply with any requirement of this Order shall subject Respondent to additional liability for a civil penalty of up to TWENTY-FIVE THOUSAND DOLLARS (\$25,000) for each day of continued noncompliance with this Order pursuant to RCRA Section 3008(c).

NOTICE OF OPPORTUNITY FOR HEARING

The above-named Respondent has the right to request a hearing to contest any material factual allegation set forth in the Complaint and Compliance Order or the appropriateness of any proposed compliance schedule or penalty. Unless said Respondent has requested in writing a hearing not later than thirty (30) days from the date this Complaint is served, Respondent may be found in default of the above Complaint and Compliance Order.

To avoid a finding of default by the Regional Administrator, you must file a written answer to this Complaint with the Regional Hearing Clerk, Planning and Management Division, U.S. EPA, Region V, 230 S. Dearborn Street, Chicago, Illinois 60604, within thirty (30) days of your receipt of this notice. A copy of your answer and any subsequent documents filed in this action should also be sent to Ms. Nola Hicks, Assistant Regional Counsel, at the same address. Failure to answer within thirty (30) days of receipt of this Complaint may result in a finding by the Regional Administrator that the entire amount of penalty sought in the Complaint is due and payable and subject to the interest and penalty provisions contained in the Federal Claims Collection Act of 1966, 31 U.S.C. §§3701 et seq.

Your answer should clearly and directly admit, deny, or explain each of the factual allegations of which you have knowledge. Said answer should contain: (1) a definite statement of the facts which constitute the grounds of defense, and (2) a concise statement of the facts which you intend to place at issue in the hearing. The denial of any material fact or the raising of any affirmative defense shall be construed as a request for a hearing.

The Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22, are applicable to this administrative action. A copy of these Rules is enclosed with this Complaint.

SETTLEMENT CONFERENCE

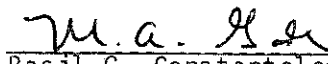
Whether or not you request a hearing, you may confer informally with U.S. EPA concerning (1) whether the alleged violations in fact occurred as set forth above, (2) the appropriateness of the compliance schedule, and (3) the appropriateness

of any penalty assessment in relation to the size of your business, the gravity of the violations, and the effect of the penalty on your ability to continue in business.

You may request an informal settlement conference by contacting this office. However, any such request will not affect the 30 day limit for responding with an answer to this Complaint and requesting a formal public hearing on the violations alleged herein. U.S. EPA encourages all parties to pursue the possibilities of settlement through informal conferences.

Request for an informal conference should be made to Mr. Oliver L. Warnsley, Waste Management Division, 230 S. Dearborn Street, Chicago, Illinois 60604. The telephone number is (312) 886-6533.

Signed this 11th day of June, 1986.


Basil G. Constantelos, Director
Waste Management Division
Complainant
U.S. Environmental Protection Agency
Region V

CERTIFICATE OF SERVICE

I hereby certify that I have caused copies of the foregoing Complaint and Compliance Order to be served upon the persons designated below on the date below, by causing said copies to be deposited in the U.S. Mail, First Class and certified return receipt requested, postage prepaid, at Chicago, Illinois in envelopes addressed to:

C. T. Corporation System,
Registered Agent for
Dana Corporation
208 South LaSalle Street
Chicago, Illinois 60604

Mr. R. Fraske
Dana Corporation-Victor Product Division
5750 W. Roosevelt Road
Chicago, Illinois 60690

I have further caused the original of the Complaint and this certification of service to be served in the Office of the Regional Hearing Clerk located in the Planning and Management Division, U.S. EPA, Region V, at 230 South Dearborn Street, Chicago, Illinois 60604, on the date below.

These are said persons' last know addresses to the subscriber.

Dated this 13 day of June, 1986.

Alan Sharp, for
Secretary
Hazardous Waste Enforcement Branch

O. Warnsley / Hicks

PART I. BACKGROUND

FACILITY NAME Dana Corporation - Chicago Plant
 FACILITY LOCATION 5750 W. Roosevelt Road, Chicago, IL
 RCRA ID NUMBER ILD 068 469 386
 NATURE OF VIOLATION Financial Responsibility

ANY OTHER OUTSTANDING OR PAST ENFORCEMENT ACTIONS AGAINST THIS FACILITY:

WATER _____
 AIR W/A
 OTHER _____

PART II. RECOMMENDATION

To issue AO with Penalty

PART III. CONCURRENCES ON DRAFT

	INITIALS	DATE	AGREE	DISAGREE
PREPARER	<u>Olw</u>	<u>4-21-86</u>	(✓)	()
CHIEF, RCRA ENF. UNIT	<u>RIC</u>	<u>4-25-86</u>	(✓)	()
CHIEF, RCRA ENF. SECTION	<u>JMB for WEM</u>	<u>4-29-86</u>	(✓)	()
ASSISTANT REGIONAL COUNSEL	<u>WEM</u>	<u>4-30-86</u>	(✓)	()
<u>Nola M. Hicks</u>	<u>NH</u>	<u>5-19-86</u>	(✓)	()

NAME & DATE OF STATE CONTACT NOTIFIED John Bohansky
Paul Jogiello (217) 782-5544 May 21, 1986

PART IV. APPROVAL

1. PREPARER	<u>Olw</u>	<u>5-21-86</u>	(✓)	()
2. CHIEF, RCRA ENF. UNIT	<u>Olw</u>	<u>5-22-86</u>	(✓)	()
3. CHIEF, RCRA ENF. SECTION	<u>WEM</u>	<u>5-27-86</u>	(✓)	()
4. CHIEF, H.W. ENF. BRANCH	<u>Olw</u>	<u>5-28-86</u>	(✓)	()
5. ASSISTANT REGIONAL COUNSEL	<u>Nola Hicks</u>	<u>5-29-86</u>	(✓)	()
6. CHIEF, S.W. & E.R. SECTION	<u>LK</u>	<u>5-29-86</u>	(✓)	()
7. CHIEF, SOLID WASTE & EMER. RESPONSE BRANCH	<u>MM</u>	<u>5-31-86</u>	(✓)	()
8. REGIONAL COUNSEL	_____	_____	()	()
9. DIRECTOR, WASTE MGT. DIV.	<u>WMB</u> <u>for COMD</u>	<u>6/11/86</u>	(X)	()

NOTE: Attach sign-off sheet to yellow copy of the enforcement action.



(217)782-5544

March 20, 1986

Mr. Oliver Warnsley
Waste Management Division
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

RECEIVED
MAR 24 1986
U.S. EPA REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT PROGRAM

Re: Chicago/Dana Corp. -- Victor Products Div.
Cook County/LPC #0315100003
IEPA Enforcement #7812-HAZ
ILD #068469386

Dear Mr. Warnsley:

Pursuant to our telephone conversation of March 20, 1986, I have enclosed a copy of the February 13, 1986 letter in which the Agency approved the closure plan re-submitted by Dana Corp. in December, 1985 for the Chicago facility.

Dana Corp.'s next step is to close the hazardous waste storage area at the Chicago facility in conformance with the approved closure plan.

Although any closure problem at the facility may have been resolved, Financial Requirement violations are still outstanding. You may want to speak to Andy Vollmer at 217/782-6762 about the Financial Requirement violations.

If I can be of further assistance, just let me know.

Sincerely yours,

Paul R. Jagiello
Attorney
Enforcement Programs

PRJ:mm

Enclosure

cc: Gary King



Faint horizontal line of text across the top of the page.

Vertical text on the left side, possibly a date or reference number.

THE
UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

WASHINGTON, D. C. 20240

TO: [illegible]
FROM: [illegible]
SUBJECT: [illegible]

DATE: [illegible]
BY: [illegible]

RE: [illegible]
[illegible]
[illegible]

1. [illegible]

Page 1 of 1



Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

(217)782-5544

February 10, 1986

Mr. Basil G. Constantelos, Director
Waste Management Division
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

RECEIVED
FEB 11 1986
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

Re: Request for Compliance Order
*Chicago/Dana Corp. -- Victor Products Div.
Cook County/LPC #0315100003
IEPA Enforcement #7812-HAZ
ILD #068469386

* In correspondence between Dana Corp. and the Agency, the facility in Cook County is referred to as both Cicero and Chicago Dana Corp. The same facility is being referred to. According to the most recent Agency information, the Agency refers to the facility as Chicago/Dana Corp. rather than Cicero/Dana Corp.

Robinson/Dana Corp. -- Victor Products Div.
Crawford County/LPC #0338080007
IEPA Enforcement #7813-HAZ
ILD #047074661

Dear Mr. Constantelos:

This Agency hereby requests that you issue Compliance Orders against the above referenced facilities. The bases of the Compliance Orders are violations of the RCRA interim status regulations for hazardous waste management operations (35 Ill. Adm. Code 725 and 40 CFR 265) presently existing at the facility. The enclosed memoranda and correspondence have been prepared by this Agency to support this enforcement action against the Dana Corp. facilities.

The violations existing at both facilities include violations of Subpart G (Closure and Post-Closure) and Subpart H (Financial Requirements). The violations existing at the Chicago facility are more speci-

fically described in the April 10, 1985 PECL sent to that facility. The violations existing at the Robinson facility are also specifically described in an April 10, 1985 PECL which was sent to that facility. The violations existing at each facility are also restated in the May 14, 1985 PECL.

A CIL was sent to each Dana Corp. facility on December 21, 1984 regarding each facility's financial assurance and closure/post-closure deficiencies. The deficiencies and regulatory violations are more specifically stated in the December 21, 1984 CIL sent to each facility. On April 10, 1985 a PECL was sent to each Dana Corp. facility again setting forth the deficiencies and regulatory violations which existed at each facility. A Pre-Enforcement Conference was set for May 3, 1985 at 10:00 a.m. At the request of Dana Corp., the May 3, 1985 conference was cancelled and rescheduled for May 21, 1985.

At the May 21, 1985 conference, Dana Corp. representatives stated that they were going to take the steps necessary to close the hazardous waste storage areas at the Chicago and Robinson facilities. Closure plans for the two facilities were to be submitted to the Agency by June 10, 1985.

As a result of the May 21, 1985 Pre-Enforcement Conference, Dana Corp. submitted updated information regarding its liability coverage and closure/post-closure cost estimates. This submittal from Dana Corp. is dated June 25, 1985. The submitted information was reviewed by Agency personnel in the Program Development Unit and was found to be inadequate. The deficiencies in the June 25, 1985 submittals are more specifically described in the document reviewer's notes dated July 9, 1985. There is a reviewer's note sheet for each facility.

Any questions regarding the inadequacy of Dana Corp.'s financial assurance or closure/post-closure submittals may be directed to Mr. Andy Vollmer at 217/782-6762.

On July 10, 1985, Gabriel and Associates sent a letter to the Agency in which an extension of the Closure Plan submission deadline was requested. The Agency did not agree to extend the submittal due date.

Closure plans for both facilities, Chicago and Robinson, were submitted to the Agency on August 14, 1985. After review, both closure plans were found to be inadequate. A Notice of Deficiency was sent to the Dana Corp., Chicago facility on November 13, 1985 and to the Robinson facility on November 14, 1985.

A Closure Plan was resubmitted in December, 1985 for the Chicago facility and is in the process of being reviewed by the Agency.

A revised Closure Plan for the Robinson facility was not submitted within the thirty (30) day period in violation of 35 Ill. Adm. Code 725.212(d) (40 CFR 265-112(d)).

Any questions relating to the closure submittals for the Chicago facility may be directed to Jeanette Virgilio at 217/782-6762. Any questions relating to the closure submittals for the Robinson facility may be directed to Marla Layman at 217/782-6762.

We also request that Virginia Yang, Enforcement Attorney for the Central Region, be notified of the technical and legal staff assigned to matters relating to the Dana Corp. facility located in Robinson, Illinois (Crawford County). Please notify Paul Jagiello, Enforcement Attorney for the Northern Region, of the technical and legal staff assigned to matters relating to the Dana Corp. facility located in Chicago, Illinois (Cook County). We will update the enclosed materials with additional reports and correspondence as necessary. Please provide Virginia Yang with copies of any Compliance Order issued in this case against the facility located in Robinson, Illinois and Paul Jagiello with copies of any Compliance Order issued in this case against the facility located in Chicago, Illinois.

If you need further information or have any questions regarding the Dana Corp. facility in Robinson, Illinois, please contact Virginia Yang. If you need further information or have any questions relating to the Dana Corp. facility in Chicago, Illinois, please contact Paul Jagiello. Both attorneys can be contacted at 217/782-5544.

Very truly yours,

Gary P. King

Gary P. King
Senior Attorney
Enforcement Programs

GPk:mm

Attachments

cc: Bill Miner, USEPA (w/out att.)
Mary Gade, USEPA (w/out att.)
Bill Muno, USEPA (w/out att.)
Thomas Goltz, USEPA (w/out att.)
Jody Traub, USEPA (w/out att.)
Robert Kuykendall (w/out att.)
Bill Radlinski (w/out att.)
Ken Bechely (w/out att.)
Andy Vollmer (w/out att.)
DLPC Div. File (w/out att.)
Glenn Savage (w/out att.)
Dave Jansen (w/out att.)
Docket Control (w/out att.)

LIST OF ATTACHED EXHIBITS

1. IEPA Observation Report and Comments dated 2/24/83 (2 pg.)
2. April 26, 1983 letter from Dana Corp. to IEPA Re: financial assurance (8 pg.)
3. March 2, 1984 letter from Andrew Vollmer to Robert Byrket Re: financial assurance (2 pg.)
4. May 9, 1984 letter from Chris Jackson to IEPA Re: Certificate of Liability Insurance (2 pg.)
5. CIL dated December 21, 1984 (Robinson facility) (2 pg.)
6. CIL dated December 21, 1984 (Chicago facility) (2 pg.)
7. January 24, 1985 letter from Clement Revetti to Rama Chaturvedi and attachments (7 pg.)
8. January 24, 1985 letter from Don Owens to Rama Chaturvedi Re: Closure-Post-Closure Plan for Robinson, Illinois facility (4 pg.)
9. January 24, 1985 letter from Richard Fraske to Rama Chaturvedi Re: Post-Closure Plan for Chicago, Illinois facility (4 pg.)
10. February 13, 1985 letter from Paul Springman to IEPA (1 pg.)
11. Reviewer's notes dated February 14, 1985 for financial assurance and Closure/Post-Closure requirements for the Dana Corp. Chicago, Illinois facility (8 pg.)
12. Reviewer's notes dated February 14, 1985 for Financial Assurance and Closure/Post-Closure requirements for the Dana Corp. Robinson, Illinois facility (8 pg.)
13. March 21, 1985 letter from Clement Revetti to the Director IEPA Re: Closure/Post-Closure Cost Estimates (8 pg.)
14. Memo dated April 4, 1985 from Andy Vollmer to Compliance Section (1 pg.)
15. PECL dated April 10, 1985 (Robinson, Illinois facility) (3 pg.)
16. PECL dated April 10, 1985 (Chicago, Illinois facility) (3 pg.)
17. April 17, 1985 letter from Evelyn Koralich to Michael Nechvatal Re: Certificate of Insurance (3 pg.)
18. April 18, 1985 letter from Clement Revetti to Bur Filson and attachments (9 pg.)
19. April 26, 1985 letter from Andrew Vollmer to Evelyn Koralich (1 pg.)

20. May 2, 1985 letter from Clement Revetti to Bur Filson (1 pg.)
21. May 7, 1985 letter from Norm Smith to Michael Nechvatal (1 pg.)
22. PECC dated May 14, 1985 (4 pg.)
23. May 17, 1985 letter from Richard Friske to Nicholas Malone (1 pg.)
24. May 17, 1985 letter from Pat McVickar to Nicholas Malone (1 pg.)
25. May 20, 1985 letter and attachments from Nicholas Malone to Richard Friske (11 pg.)
26. PECL attendance sheet and notes dated May 21, 1985 (1 pg.)
27. June 3, 1985 letter and attachment from Nicholas Malone to Michael Nechvatal (2 pg.)
28. June 25, 1985 letter and attachments from Clement Revetti to Director, IEPA Re: liability coverage and closure/post-closure cost estimates (11 pg.)
29. Reviewer's (Andy Vollmer) notes dated July 9, 1985 regarding Dana Corp.'s June 25, 1985 submittal relating to the Robinson facility (1 pg.)
30. Reviewer's (Andy Vollmer) notes dated July 9, 1985 regarding Dana Corp.'s June 25, 1985 submittal relating to the Chicago facility (1 pg.)
31. July 10, 1985 letter from Nicholas Malone to Michael Nechvatal Re: Closure Plan Status for Chicago and Robinson facilities (1 pg.)
32. Closure plans for the Dana Corp. Chicago and Robinson facilities dated August 14, 1985 (15 pg.)
33. November 13, 1985 letter from Lawrence Eastep to Richard Friske Re: Deficiencies in Closure Plan for Dana Corp. Cook County (Chicago) facility (2 pg.)
34. November 14, 1985 letter from Lawrence Eastep to Dana Corp. Re: Deficiencies in Closure Plan for Dana Corp. Crawford County (Robinson) facility (2 pg.)

DATE: 5-21-85

ILD Number ILD 047074661 + ILD 068469386

FACILITY NAME Dana Corp

TYPE OF MEETING: FACEM/PECL

Attendance at Meeting:

IEPA

Facility

Andrew Vallmar
Paul R. Jazullo / Enf.
Michelle D. Tebagg (HWRC)
Ben Nelson (HWRC)
William E Zierath (Field Ops. - Central Region)
Rama K. Chaturvedi

NJ MACONE Grub. & Assoc. / Dan

Message:

Will send letter of intent.

Ins & Closure plan be submitted by

June 15, 1985



217/782-6761

Refer to: 0315100003 -- Cook County
Cicero/Dana Corp.--Victor Products Div.
ILD068469386

0338080007 -- Crawford County
Robinson/Dana Corp.--Victor Products Div.
ILD047074661

May 14, 1985

CERTIFIED # P731918163

Mr. Clement A. Revetti
Dana Corp.
Post Office Box 1000
Toledo, Ohio 43697

Dear Mr. Revetti:

The Agency has previously informed Dana Corporation -- Victor Products Division of apparent violations of the Illinois Environmental Protection Act and/or rules and regulations adopted thereunder in an April 10, 1985 Pre-Enforcement Conference Letter. At the request of John Polick, Gabriel and Associates, the conference originally scheduled for May 3, 1985, has been rescheduled for May 21, 1985 at 10:00 A.M. at the Division of Land Pollution Control, 2200 Churchill Road, Springfield, Illinois 62706.

The May 21, 1985 conference date will be the only extension granted to Dana Corporation to meet with this Agency to discuss the violations listed in the attachments to the April 10, 1985 Pre-Enforcement Conference Letters. You are requested to bring any documents and plans necessary to address these violations to the conference for review by the Agency. Dana Corporation is currently subject to a USEPA enforcement audit; consequently failure to address the violations listed in the April 10, 1985 letters can result in the referral of an enforcement case to the USEPA Region V offices for the issuance of a federal compliance order against the company.

Enclosed are copies of the attachments to the April 10, 1985 Pre-Enforcement Conference Letters.

Sincerely,

Mark B. Nechvatal for

Michael F. Nechvatal, Manager
Compliance Monitoring Section
Division of Land Pollution Control

MFN:BF:mkb:16/160

Enclosures

cc: Division File
Central Region
Northern Region
Gary King
Virginia Yang
Paul Jagiello
Andy Vollmer ✓
John Polick, Gabriel and Associates
Michelle Tebrugge
Bur Filson



Refer to: 0310510003 -- Cook County
Cicero/Dana Corp. -- Victor Products Div.
ILD068469386

FA082

ATTACHMENT A

1. The closure performance standard is not given in the closure plan as required by 725.211 (40 CFR 265.111). The owner or operator must close his facility in a manner that: 1) minimizes the need for further maintenance; and 2) controls, minimizes or eliminates, to the extent necessary to protect human health and environment, post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall or waste decomposition products to the ground or surface waters or to the atmosphere.
2. The closure plan does not give an estimated year of closure or a schedule for final closure as required by 725.212(a)(4) (40 CFR 265.112(a)(4)). An estimate of the expected year of closure and a schedule for final closure must be provided.
3. The closure plan does not give the tank sizes and the maximum inventory of wastes as required by 725.212(a)(2) (40 CFR 265.112(a)(2)). An estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility must be provided.
4. The closure plan does not give the steps necessary to decontaminate the facility as required by 725.212(a)(3) (40 CFR 265.112(a)(3)). A description of the steps necessary to decontaminate facility equipment during closure must be provided.
5. The step of certification is not given as required by 725.215 (40 CFR 265.115). When closure is completed, the owner or operator must submit to the Director certification by both the owner or operator and by an independent registered certified engineer that the facility has been closed in accordance with the specifications in the approved closure plan.
6. The closure cost estimate is not itemized step by step as required by 725.242 (40 CFR 265.142). The owner or operator must prepare a written estimate, in current dollars, of the cost of closing the facility in accordance with the closure plan.
7. The wrong USEPA I.D. Number is listed on the letter from the Chief Financial Officer.
8. Sudden Liability Insurance was not furnished as required by 725.245 (40 CFR 265.147).

CSD:sd/782e/42



Refer to: 0338080007 -- Crawford County
Robinson/Dana Corp. -- Victor Products Div.
ILD047074661

FA082

ATTACHMENT A

1. The closure plan does not give a schedule for final closure as required by 725.212(a)(4) (40 CFR 265.112(a)(4)). An estimate of the expected year of closure and a schedule for final closure must be submitted.
2. The closure plan does not give the steps of decontamination as required by 725.212(a)(3) (40 CFR 265.112(a)(3)). A description of the steps needed to decontaminate facility equipment during closure must be submitted.
3. The closure plan does not give the steps of certification as required by 725.215 (40 CFR 265.115). When closure is completed, the owner or operator must submit to the Director certification by both the owner or operator and by an independent registered certified engineer that the facility has been closed in accordance with the specifications in the approved closure plan.
4. The closure cost estimate does not give a cost for certification as required by 725.242(a) (40 CFR 265.142(a)). The owner or operator must prepare a written estimate, in current dollars, the cost of closing the facility in accordance with the closure plan.
5. Sudden Liability Insurance was not furnished as required by 725.245 (40 CFR 265.147). The owner or operator must have and maintain liability insurance coverage for sudden accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million.

BF:sd/782e/39



CORPORATE OFFICES

May 2, 1985

Mr. Bur Filson
Illinois E.P.A.
Division of Land Pollution Control
2200 Churchill Road
Springfield, IL 62706

RECEIVED

MAY 07 1985

IEPA-DLPC

Re: 0338080007 - Crawford County
Robinson/Dana Corp.-Victor Products Div.
ILD 047074661
AND
0310510003 - Cook County
Cicero/Dana Corp. - Victor Products Div.
ILD 068469386

Dear Mr. Filson:

This is to advise you that Gabriel and Associates, 1814 N. Marshfield Road, Chicago, Illinois has been retained by Victor Chicago and Victor Robinson for the purpose of securing compliance with the notices of April 10, 1985.

Also be advised that Gabriel and Associates hopes to finalize documentation by the May 14, 1985 meeting date. However, Mr. John Polich of said firm will be in contact with you during the interim to help keep you apprised. His number is (312) 486-2123.

Since I will be out of the office until May 15th, please feel free to contact Mr. Friske at Victor Chicago, Mr. McVickar at Victor Robinson or Mr. Polich if you have any questions.

Very truly yours,

Clement A. Revetti
Legal Counsel

CAR/mlc
cc: P. McVickar
R. Friske



217/782-6761

Refer to: 0310510003 -- Cook County
Cicero/Dana Corp. -- Victor Products Div.
ILD068469358

FA082

PRE-ENFORCEMENT CONFERENCE LETTER

Certified # *P731918116*

April 10, 1985

Mr. Clement A. Revetti
Dana Corp.
Post Office Box 1000
Toledo, Ohio 43697

Dear Mr. Revetti:

The Agency has previously informed Dana Corp. -- Victor Products Division of apparent violations of the Illinois Environmental Protection Act and/or rules and regulations adopted thereunder. These apparent violations are set forth in Attachment A of this letter.

As a result of these apparent violations, it is our intent to refer this matter to the Agency's legal staff for the preparation of a formal enforcement case. The Agency's legal staff will, in turn, refer this matter to the Office of Attorney General or to the United States Environmental Protection Agency for the filing of a formal complaint.

Prior to taking such action, however, you are requested to attend a Pre-Enforcement Conference to be held at the Division of Land Pollution Control, 2200 Churchill Road, Springfield, Illinois, 62706. The purpose of this Conference will be:

1. To discuss the validity of the apparent violations noted by Agency staff, and
2. To arrive at a program to eliminate existing and/or future violations.

You should, therefore, bring such personnel and records to the conference as will enable a complete discussion of the above items. We have scheduled the Conference for May 3, 1985, at 10:00 AM. If this arrangement is inconvenient, please contact Ben Filson at 217/795-8447 to arrange for an alternative date and time.



Page 2

In addition, please be advised that this letter constitutes the notice required by Section 31(d) of the Illinois Environmental Protection Act prior to the filing of a formal complaint. The cited Section of the Illinois Environmental Protection Act requires the Agency to inform you of the charges which are to be alleged and offer you the opportunity to meet with appropriate officials within thirty days of this notice date in an effort to resolve such conflict which could lead to the filing of formal action.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael F. Nechvatal".

Michael F. Nechvatal, Manager
Compliance Monitoring Section
Division of Land Pollution Control

MFN:BF:sd/782e/40-41

Attachment

cc: Division File ✓
Northern Region
Paul Jagiello
Andy Vollmer
Gary King
Michelle Tebrugge



Refer to: 0310510003 -- Cook County
Cicero/Dana Corp. -- Victor Products Div.
ILD068469386

FA082

ATTACHMENT A

1. The closure performance standard is not given in the closure plan as required by 725.211 (40 CFR 265.111). The owner or operator must close his facility in a manner that: 1) minimizes the need for further maintenance; and 2) controls, minimizes or eliminates, to the extent necessary to protect human health and environment, post-closure escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall or waste decomposition products to the ground or surface waters or to the atmosphere.
2. The closure plan does not give an estimated year of closure or a schedule for final closure as required by 725.212(a)(4) (40 CFR 265.112(a)(4)). An estimate of the expected year of closure and a schedule for final closure must be provided.
3. The closure plan does not give the tank sizes and the maximum inventory of wastes as required by 725.212(a)(2) (40 CFR 265.112(a)(2)). An estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility must be provided.
4. The closure plan does not give the steps necessary to decontaminate the facility as required by 725.212(a)(3) (40 CFR 265.112(a)(3)). A description of the steps necessary to decontaminate facility equipment during closure must be provided.
5. The step of certification is not given as required by 725.215 (40 CFR 265.115). When closure is completed, the owner or operator must submit to the Director certification by both the owner or operator and by an independent registered certified engineer that the facility has been closed in accordance with the specifications in the approved closure plan.
6. The closure cost estimate is not itemized step by step as required by 725.242 (40 CFR 265.142). The owner or operator must prepare a written estimate, in current dollars, of the cost of closing the facility in accordance with the closure plan.
7. The wrong USEPA I.D. Number is listed on the letter from the Chief Financial Officer.
8. Sudden Liability Insurance was not furnished as required by 725.245 (40 CFR 265.147).

CSD:sd/782e/42



Environmental Protection Agency⁶⁸¹

1701 S. First Street Maywood, IL. 60153

312/345-9780

Refer to: 03105103 - Cook County - Cicero/Victor Products
ILD068469386

March 29, 1982

Victor Products Division
P.O. Box 1333
Chicago, Illinois 60690

Gentlemen:

An inspection of the above facility was conducted by a representative of the Illinois Environmental Protection Agency (IEPA) on March 2, 1982. This inspection was conducted by the Illinois Environmental Protection Agency under a Cooperative Arrangement with, and authorization of, the United States Environmental Protection Agency (USEPA). A copy of the inspection report is enclosed. The purpose of the inspection was to determine your facility's compliance status with the Resource Conservation and Recovery Act (RCRA) of 1976, P.L. 94-580, as amended. We are pleased to report that your facility was found to be in compliance.

Your cooperation and efforts in this matter are appreciated. Should you have any questions about the report, please contact J. Evans at the above number.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kenneth P. Bechely". The signature is written in a cursive, flowing style.

Kenneth P. Bechely, Northern Region Manager
Field Operations Section
Division of Land/Noise Pollution Control

KPB:JPE:prb

Enclosure: Inspection Report

cc: Division File
Northern Region
U.S. E.P.A. - Region V

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

- (A) Facility Name: VICTOR PRODUCTS / Div. Chgo Plant
(B) Street: 5750 W Roosevelt
(C) City: Chicago Cicero (D) State: IL (E) Zip Code: 60650
(F) Phone: 312-287-6180 (G) County: Cook
(H) Operator: ^{mailing Address} VICTOR PRODUCTS Div. Chgo Plant
(I) Street: P.O. Box 1333
(J) City: Chicago (K) State: IL (L) Zip Code: 60650
(M) Phone: (312) 287-6180 (N) County: Cook
(O) Owner: DANA CORPORATION
(P) Street: 4500 DARR STREET
(Q) City: Toledo (R) State: Ohio (S) Zip Code: 43697
(T) Phone: 419-535-4510 (U) County: _____
(V) Date of Inspection: 3-2-82 (W) Time of Inspection (From) 10:00A (To) 10:45A
(X) Weather Conditions: Snow / ~30°

Inspection Report
has had pages
11 thru 18 omitted

(Y)	Person(s) Interviewed	Title	Telephone
	<u>Richard FRASKE</u>	<u>Chief Facilities Eng.</u>	<u>(312) 287-6180</u>
	<u>C. Hayden</u>	<u>Chemist</u>	<u>(312) 287-6180</u>
(Z)	Inspection Participants	Agency/Title	Telephone
	<u>Jay EVANS</u>		
	<u>Lynn CRIVELLO</u>	<u>IEPA / EPS</u>	<u>(312) 345-9780</u>
	<u>JAY EVANS</u>	<u>IEPA / F.P.S</u>	<u>345-9780</u>
(AA)	Preparer Information		
	Name	Agency/Title	Telephone
	<u>Jay EVANS</u>	<u>IEPA / EPS</u>	<u>(312) 345-9780</u>

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- I A. Storage and/or Treatment
1. Containers (I)
 2. Tanks (J)
 3. Surface Impoundments (K)
 4. Waste Piles (L)

N/A B. Land Treatment (M)

N/A C. Landfills (N)

N/A D. Incineration and/or Thermal Treatment (O and P)

N/A E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	<u>N/A</u>	—	—	—
2. Facility expansion?	<u>N/A</u>	—	—	—
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>✓</u>	—	—	—
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<u>✓</u>	—	—	—
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<u>N/A</u>	—	—	<u>Site doesn't receive any waste from off site.</u>
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	<u>✓</u>	—	—	<u>Guard Service 24 hrs a day</u>
2. Artificial or natural barrier around facility?	<u>✓</u>	—	—	<u>Fence</u>
3. Controlled entry?	<u>✓</u>	—	—	<u>Gates / Add Guards</u>
4. Danger sign(s) at entrance?	<u>✓</u>	—	—	—
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	<u>✓</u>	—	—	—
2. Records of operator error?	<u>✓</u>	—	—	—
3. Records of discharges?	<u>✓</u>	—	—	—

*Not Inspected

GENERAL FACILITY STANDARDS Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Safety, emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Security devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Operating and structural devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Inspection log?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Job descriptions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Have facility personnel received required training by 5-19-81?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Do new personnel receive required training within six months?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. No smoking signs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation
of Facility:

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

Yes No NI* Remarks

— ✓ —

(B) If required, does the facility
have the following equipment:

1. Internal communications or
alarm systems?

✓ — —

2. Telephone or 2-way radios
at the scene of operations?

✓ — —

3. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

✓ — —

Indicate the volume of water and/or foam available for fire control:

(C) Testing and Maintenance of
Emergency Equipment:

1. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

✓ — —

2. Is emergency equipment
maintained in operable
conditions?

✓ — —

(D) Has owner or operator provided
immediate access to internal
alarms? (if needed)

✓ — —

*Not Inspected

(E) Is there adequate aisle space for unobstructed movement?

 J

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
2. Arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

 J

 J

 J

 J

 J

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<u>✓</u>	—	—	
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<u>✓</u>	—	—	
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<u>✓</u>	—	—	
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u>✓</u>	—	—	
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	<u>N/A</u>	—	—	

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING
(Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<u>N/A</u>	—	—	<u>Site doesn't accept</u>
2. Are records of past shipments retained for 3 years?	<u>N/A</u>	—	—	<u>only thing from off</u>
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	<u>N/A</u>	—	—	<u>Site - manifest requirements on page 17</u>

*Not Inspected

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

✓

2. Does the operating record contain the following information:

**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

✓

c. The location and quantity of each hazardous waste within the facility?

✓

***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

N/A

e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

✓

f. Reports detailing all incidents that required implementation of the Contingency Plan?

N/A

g. All closure and post closure costs as applicable? (Effective 5-19-81)

✓

No Emergency Incident
to Cost

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Has this plan been submitted to the Regional Administrator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Has closure begun?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. Is closure estimate available by May 19, 1981?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				<input checked="" type="checkbox"/>

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: Victor Products Date of Inspection: 3/2/82

	Yes	No	NI*	Remarks
1. Are containers in good condition?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Containers are stored</u>
2. Are containers compatible with waste in them?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>outside on a concrete pad with curbing and</u>
3. Are containers stored closed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>sump pump area</u>
4. Are containers managed to prevent leaks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>does have a post well</u>
5. Are containers inspected weekly for leaks and defects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>head.</u>
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	<u>✓</u>	---	---	-----
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<u>✓</u>	---	---	-----

J
TANKS

Facility Name: _____

Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	<u>NA</u>	---	---	-----
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	<u>✓</u>	---	---	-----
3. Do continuous feed systems have a waste-feed cutoff?	<u>✓</u>	---	---	-----
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	<u>✓</u>	---	---	-----
5. Are required daily and weekly inspections done?	<u>✓</u>	---	---	-----
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	<u>✓</u>	---	---	-----
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	<u>✓</u>	---	---	-----

Yes No NI* Remarks

3. Has the owner or operator addressed the waste analysis requirements of 265.402?

4. Are inspection procedures followed according to 265.403?

5. Are the special requirements fulfilled for ignitable or reactive wastes?

6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.2; or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

Yes No NI* Remarks

(A) Does the operator have copies of the manifest available for review?

✓

(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)

1. Manifest document number?

✓

2. Name, mailing address, telephone number, and EPA ID Number of Generator

✓

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	<u>NI</u>	—	—	<u>See above comment</u>
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	<u>Y</u>	—	—	
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	—	—	—	
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	—	—	—	
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	—	—	—	
c. Do continuous feed systems have a waste-feed cutoff?	—	—	—	
d. Are required daily and weekly inspections done?	—	—	—	
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	—	—	—	
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	—	—	—	

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D).

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Has the generator submitted Annual Reports and Exception Reports as required?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	As of this date No Annual Report nor Exception Report was necessary

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
--	--------------------------	-------------------------------------	--------------------------	--

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Met the Manifest requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

X
TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?

- Yes No NI* Remarks

N/A

II. INTERNATIONAL SHIPMENTS

A. Does the transporter record on the manifest the date the waste left the U.S.?

B. Are signed completed manifest(s) on file?

↓

V. MISCELLANEOUS

A. Does transporter transport hazardous waste into the U.S. from abroad?

B. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?

↓

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

UNIVERSITY OF CALIFORNIA
LIBRARY

THE UNIVERSITY OF CALIFORNIA LIBRARY

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REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Victor Products, a subsidiary of DANA Corp, mfg automotive and heavy duty engine gaskets. As a result of their product process the following "HAZ"- wastes are generated: F001, F003 and F005, at a rate of approx. 42,000 lbs per year. All the solvents are stored and transported in 55 gallon drums. The storage of the drums are outside however the area was covered by a kant-to roof, concrete flooring with concrete curb with a sump. The facility has notified as storage facility, however the drummed waste is usually off site in less than the 90 day period but ~~the~~ "Victor" wants to maintain the storage status. The I.S.S. inspection disclosed that Victor Products was in general compliance at this time.

L P C F C O 5 5 C
(1) (8) (9)

OBSERVATION REPORT - SITE INVENTORY NO. 93105103

(11)

(18)

CO. - L.P.C.

Region # N

Date 03/22/92
(20) (25)Letter Sent (Yes or No) Y
(26)

(Location)

(Responsible Party)

Samples Taken: Yes () No (X) Time: From 10:00 A M

Weather 30° Sunny

Ground Water () Surface () Other () To 10:45 A M

Photos Taken: Yes () No (X) Interviewed Richard Braske

Inspector L A C
(27) (29)

Previous Inspection

Previous Correspondence

Site Open: Yes (X) No ()

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating (X)

Landfill ()

Storage (X)

E.P.A. Permit ()

Temporarily Closed ()

Random Dump ()

Salvage ()

Variance () NA

Closed Not Covered ()

Other ()

A.C.D. ()

21(e) (X)

Closed and Covered ()

Quantity Received Daily(1-6)

Board Order ()

(30)

Illegal (5) ()

(31)

IMPROVED

LPC 4 1/79 5,000

SAME

DETERIORATED

I S or D S

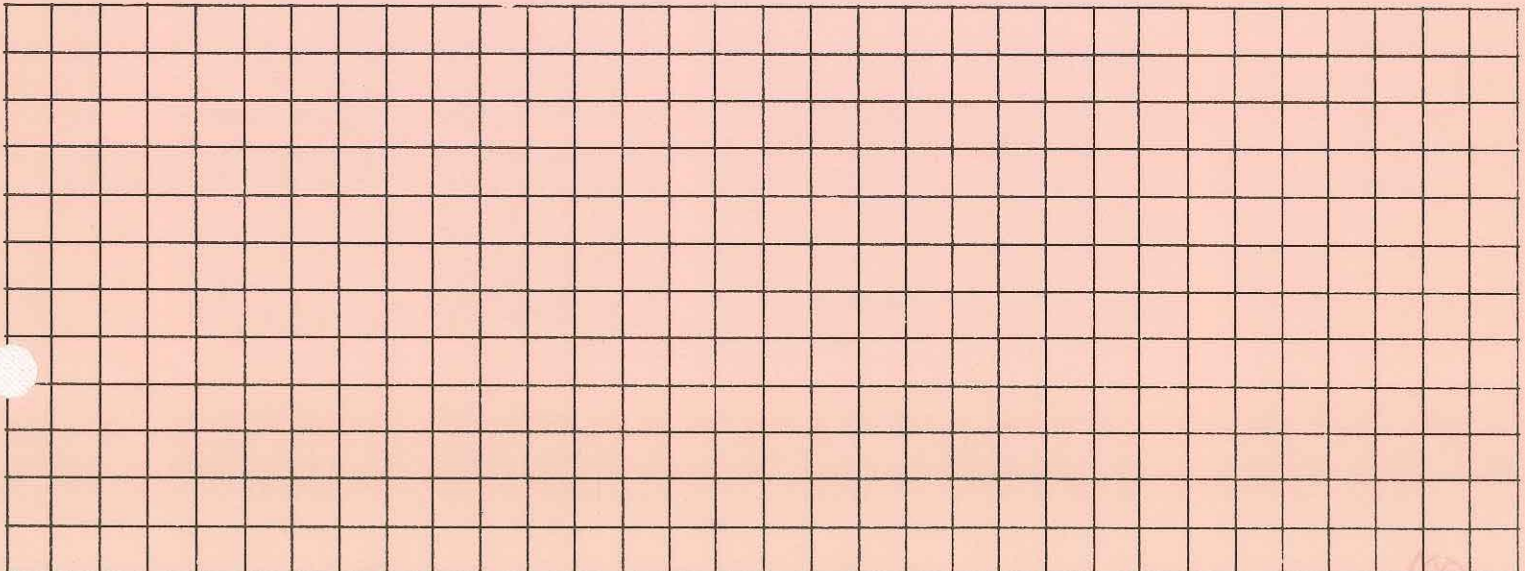
(62)

GENERAL REMARKS:

This facility manufactures automotive and heavy duty engine gaskets. Wastes generated and stored at the plant include F001, F002, F003, F004, F005. UTL, propane 2-Wire was also listed however this waste is easily propane gas cylinders which are sent back for refilling and so should not be included as hazardous waste. The total yearly volume of F001, F003, F005 is approx 42,000 lbs. The waste is stored in steel drums for a period of less than 90 days generally, however, the facility must remain a storage facility. At the time of this inspection there were 4 drums being stored. The storage area was outside, however, it was covered by a roof and the floor was concrete with leaks to a sump. All the drums were in good condition and closed. Hazardous waste labels were observed on the drums. A fence closed off the facility's storage area from the public sidewalks & street and the appropriate signs had been put up. All paper work & manifests were in order.

INTERVIEW:

DIAGRAM:



**D. Corrective
Action**



Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Refer to: 0310510003 -- Cook County
Chicago/Dana Corporation - Victor Products Div.
ILD068469386

February 13, 1986

Dana Corporation
Attention: Richard Fraske
Victor Products Division
5750 W. Roosevelt Road
Chicago, Illinois 60650

Dear Gentlemen:

The revised closure plan submitted by Nick J. Malone, Gabriel and Associates, dated December 12, 1985, and received by this Agency on December 18, 1985, to close the hazardous waste container storage area (S01) is hereby approved. The approval of these plans is further subject to the following modifications and conditions:

1. All hazardous wastes currently in storage shall be removed from site by May 14, 1986.
2. Closure shall be completed by August 12, 1986.
3. All facility equipment and personal protective gear shall be properly decontaminated and decontamination documented in accordance with procedures established in the approved closure plan, or they shall be properly disposed of.
4. All hazardous wastes and decontamination rinses/residues shall be transported to a permitted facility for disposal, incineration or further treatment utilizing the Agency's special waste stream permit and manifest systems.
5. At closure, as throughout the operating period, unless the owner or operator can demonstrate, in accordance with Section 721.103(c) and (d), that any wastes generated during closure is not a hazardous waste, the owner or operator becomes a generator of hazardous waste and must manage it in accordance with all applicable requirements of Parts 722, 723 and 725.
6. Any analytical data, documents or information to demonstrate compliance with the approved closure plan, including the above special conditions, shall be submitted to the Agency as part of the certification of closure.



Page 2

When closure is complete the owner or operator must submit to the Director certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. These certifications must be received at this Agency within 30 days after closure, or by September 12, 1986.

If the Agency determines that implementation of the closure plan fails to satisfy the requirements of 35 IAC 725.211, the Agency reserves the right to amend this closure plan.

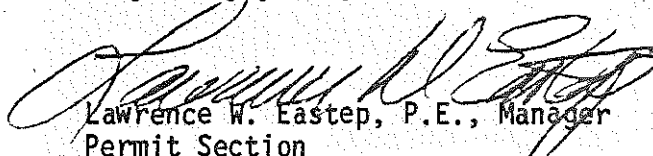
All certifications, logs, or reports which are required to be submitted to the Agency by the facility should be mailed to the following address:

Illinois Environmental Protection Agency
Division of Land Pollution Control
Permit Section
2200 Churchill Road
Springfield, Illinois 62706

The "Certification Regarding Potential Releases from Solid Waste Management Units" which you submitted is being forwarded to the USEPA for possible future action. The approval of this closure plan neither approves or disapproves of the aforementioned "Certification".

This letter constitutes final action on this matter by the Agency. Should you have any questions concerning this, please contact Jeanette Virgilio at 217/782-9875.

Very truly yours,


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:JV:ct/347F,47-48

cc: Northern Region
Division File
Financial Assurance Unit
Nick Malone, Gabriel & Associates

128-Closure

P 94 858 944

File



Illinois Environmental Protection Agency

2200 Churchill Road, Springfield, IL 62760

217/782-6752

Date Received: August 19, 1985
Log #C-178

Refer to: 0310510003 - Cook County
Chicago/Dana Corporation - Victor Products Division
ILO068462386

November 13, 1985

Dana Corporation - Victor Products Division
Attn: Richard J. Frasca
5750 W. Roosevelt Road
Chicago, Illinois 60650

Gentlemen:

The closure plan submitted by Dana Corporation and prepared by Nicholas J. Balono of Gabriel and Associates has been reviewed.

Due to the following deficiencies, the plan has been found inadequate:

1. An estimate of the maximum inventory of each type of wastes in storage at the time of closure was not indicated. In addition, the wastes were identified by USEPA Hazardous Codes F001, F003, and F005 but were not specified. (35 IAC Sec 725.212(a)).
2. A description of the steps needed to decontaminate facility equipment during closure was not provided. (35 IAC Part 725.212(a)(3)). Describe your criteria for determining contamination. Be sure to describe the specific methods to be used in decontaminating facility equipment and describe the types of sampling and analytical procedures to be implemented in determining decontamination.
3. An expected year of final closure and a schedule for closure was given. However, the schedule of closure activities presented in the plan is unclear. The schedule should give more specific times for tracking closure activities (e.g. when the facility shall initiate closure, when the hazardous wastes will be removed from site, when specific decontamination procedures shall be implemented, when certification of closure shall be conducted, etc.).
4. When closure is complete, certification must be provided by both the owner and operator and by an independent registered engineer that the facility has been closed according to the specifications set forth in the closure plan. Your closure plan does not state that certification will be performed by the owner and operator. (35 IAC Part 725.215)



Page 2

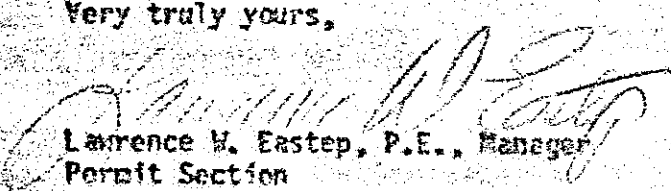
5. The closure plan did not include a description of how all hazardous waste and/or hazardous waste residues will be removed from the containment system. 35 IAC Part 724.27B requires that all remaining containers, liners, bases and soil containing or contaminated with hazardous waste or hazardous waste residues must be decontaminated or removed. Be sure to describe the specific methods to be used in decontamination activities including sampling and analytical methods for determining decontamination of containment structures and surrounding soils. Please identify all areas used for storage that are intended to be closed and provide the location, size and containment details for each. Also identify how the hazardous wastes and/or residues will be managed and where they will be sent for treatment, disposal or recovery.

6. The financial test alternative II submitted in accordance with 35 IAC Section 725.243 was not signed.

Pursuant to 725.212(d), you should submit a revised closure plan within 30 days which adequately responds to the above noted comments. Failure to submit a revised plan within 30 days will be considered non-compliance with the interim standards of 725 Subpart 6 -- Closure and Post-closure and Subpart 8 -- Financial Requirements.

Should you have any questions concerning this matter, please contact Jeanette Virgilio at 217/782-9875.

Very truly yours,


Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LAE:JV:rmi/2689E/23-24

cc: Northern Region
Division File
Financial Assurance Unit
Nicholas J. Malone
Bill Padlinski
USEPA Region V -- Ann Budich

Page 1

The above information is for your information only. It is not intended to be used for any other purpose. The information is confidential and should be kept as such. It is not to be distributed to any other person without the express written consent of the person who provided the information. The information is for your use only and should not be used for any other purpose. It is not to be distributed to any other person without the express written consent of the person who provided the information.

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Very truly yours,

Enclosed is a copy of the report of the committee on the subject of the proposed amendment to the constitution of the United States. The report is for your information only and should not be distributed to any other person without the express written consent of the person who provided the information.

Very truly yours,

Enclosed is a copy of the report of the committee on the subject of the proposed amendment to the constitution of the United States. The report is for your information only and should not be distributed to any other person without the express written consent of the person who provided the information.

gabriel and associates
gabriel and associates

RESPONSE TO 4/10/85 THE PECL
environmental consultants

1814 north marshfield

August 14, 1985

Michael F. Nechvatal
Manager
Compliance Monitoring Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, IL 62706

Subject: Revised Closure Plan Submission; Chicago, Robinson/
Dana Corporation. ILD 068469386, 047074661

Dear Mr. Nechvatal:

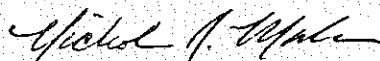
Submitted are two revised closure plans for the Illinois Victor/Dana operations. Please incorporate these plans with the previously submitted documentation and financial assurance. Corrections in the closure plans have been included as requested in writing and orally by the Illinois Environmental Protection Agency (IEPA) staff. Note that the Rule and Regulation numbers referenced in the plans are from the State of Illinois Title 35 Regulations. The intent is that any parallel or appropriate Federal Regulations contained in 40 CFR are also complied with when using the IEPA Part and Section numbers.

Also, enclosed are copies of correspondence from both facilities signifying their intent to withdraw from the Treatment, Storage and Disposal system, but continue plant production operations. This will be accomplished by performing their operations under the guidelines of 40 CFR 262.34. Therefore, a "full closure" of the facilities would not be required, only closure from the TSD system. If only a partial closure is performed by the Victor/Dana facilities (to withdraw from the TSD system), steps 1,5,6,7,8, 9,10 in the August revision of the closure plans would be performed.

If the enclosed documents are deficient in any manner or if additional information or clarification is required, please contact me promptly, so that I may expedite the information to your office.

Your best consideration in approval of the revised closure plans is greatly appreciated.

Respectfully submitted,



Nicholas J. Malone
Engineering Manager

Gabriel & Associates

NJM/pq/m3

cc: C.A. Revetti/Dana Corporation
R. Fraske/Victor Products, Chicago, IL
P. McVicker/Victor Products, Robinson, IL

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AUG 19 1985

IEPA-DLPC

gabriel and associates
gabriel and associates

environmental consultants

1814 north marshfield
chicago, illinois 60622
(312) 486-2123

CLOSURE PLAN

DANA CORPORATION

VICTOR PRODUCTS DIVISION

ROBINSON PLANT

ILD 047074661

Revised August 1985

TO

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

2200 CHURCHILL ROAD

SPRINGFIELD, ILLINOIS 62706

PREPARED BY

GABRIEL AND ASSOCIATES

1814 NORTH MARSHFIELD

CHICAGO, ILLINOIS 60622

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Closure Performance:

Closure will be executed in a manner which complies with the performance standard required by 725.211.

Closure Plan, Full Closure

1. Official notification of closure and receipt of IEPA approval to proceed.
2. Plant personnel responsible for hazardous waste materials are to implement a plant survey and inventory of each area that may contain or have contained any hazardous waste materials or scrap.
3. Review survey and implement a containerization program of hazardous waste materials labeling containers and preparing the necessary documentation as required by Title 35, Part 722. Shipment of all containerized waste to be performed by a licensed hazardous waste hauler and in accordance with Title 35, Part 723.
4. Plant personnel to inventory all hazardous or potentially hazardous materials and return to vendors undertaking the necessary and law-full precautions during the process.
5. De-contaminate storage site and any contaminated equipment and remove de-contamination residues per step 3.
6. Request a site survey and certification of the site integrity by a registered professional engineer. Testing to be performed where required by the consultant or the IEPA and all sampling, sample preservation, and sample analysis to be performed using accepted ASTM, EPA or Standard Methods procedures.
7. Review site analysis data and re-decontaminate or dispose where required to comply with section 725.211.
8. Notify the IEPA of closure completion and transmit the Consultants Certification of Closure Compliance within 180 days of IEPA approval to proceed.
9. Assist with the IEPA site inspection.
10. Comply with or discuss any further IEPA requests regarding closure.

gabriel and associates

Maximum Inventory of Hazardous Wastes

EPA Waste Classification	Total Annual Volume	Estimated Max. Number of (55) Gallon Containers	Estimated Max. Number of Waste Storage Bags
U013			
U154			
U220			
U159			
U002			
U021			
	1825 gallons	34	120

Expected Year of Closure: 1986

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IEPA-DLPC

DANA CORPORATION

CLOSURE SCHEDULE

	<u>Working Days</u>
Final Closure Plan submission and approval by Illinois Environmental Protection Agency (IEPA)	60
Official closure notification Receipt of IEPA closure approval	10
Closure	90
Site inspection and testing	30
Certification	10
Notification of closure completion and certification transmission	<u>10</u>
Total	210

CLOSURE COST ESTIMATEPer 725.212

Remove maximum inventory of 55 gallon drums from site. 34 at 75.00 each per part 725	\$2,550.00
De-contaminate site and closure equipment per 725.211	2,640.00
Labor: Supervisor (working) 16 hours at 35.00/hour	560.00
Laborer 16 hours at 25.50/hour	408.00
Materials: (6) Drums at 17.50 each	105.00
Detergent	N/C
Equipment: Steam Cleaner (2) days at 250.00/day	500.00
Wastewater Removal: (6) Drums at 75.00/Drum	450.00
Engineering, Supervision, Testing and Certification per 725.215	6,200.00 \$13,413.00
Total Estimated Closure Cost	<u>= \$13,500.00</u>

Note:

Site testing for traces of contaminants that were stored on site, if necessary for certification and assurance per 725.211, will be performed. Sampling and analysis will be performed using the latest, most applicable ASTM, EPA or Standard Methods procedures.

Hazardous Compounds: U013, U154, U220, U159, U002, U021

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IEPA-DLPC

gabriel and associates
gabriel and associates

environmental consultants

1814 north marshfield
chicago, illinois 60622
(312) 486-2123

CLOSURE PLAN

DANA CORPORATION

VICTOR PRODUCTS DIVISION

CHICAGO PLANT

ILD 068469386

Revised August 1985

TO

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

2200 CHURCHILL ROAD

SPRINGFIELD, ILLINOIS 62706

PREPARED BY

GABRIEL AND ASSOCIATES

1814 NORTH MARSHFIELD

CHICAGO, ILLINOIS 60622

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AUG 19 1985

IEPA-DE

Closure Performance:

Closure will be executed in a manner which complies with the performance standard required by 725.211.

Closure Plan, Full Closure

1. Official notification of closure and receipt of IEPA approval to proceed.
2. Plant personnel responsible for hazardous waste materials are to implement a plant survey and inventory of each area that may contain or have contained any hazardous waste materials or scrap.
3. Review survey and implement a containerization program of hazardous waste materials labeling containers and preparing the necessary documentation as required by Title 35, Part 722. Shipment of all containerized waste to be performed by a licensed hazardous waste hauler and in accordance with Title 35, Part 723.
4. Plant personnel to inventory all hazardous or potentially hazardous materials and return to vendors undertaking the necessary and law-full precautions during the process.
5. De-contaminate storage site and any contaminated equipment and remove de-contamination residues per step 3.
6. Request a site survey and certification of the site integrity by a registered professional engineer. Testing to be performed where required by the consultant or the IEPA and all sampling, sample preservation, and sample analysis to be performed using accepted ASTM, EPA or Standard Methods procedures.
7. Review site analysis data and re-decontaminate or dispose where required to comply with section 725.211.
8. Notify the IEPA of closure completion and transmit the Consultants Certification of Closure Compliance within 180 days of IEPA approval to proceed.
9. Assist with the IEPA site inspection.
10. Comply with or discuss any further IEPA requests regarding closure.

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Maximum Inventory of Hazardous Wastes

EPA Waste Class	Total Annual Volume	Total Annual Containers	Maximum Total Closure Containers for Removal
F001		55 Gallon DOT Drums For Hazardous Waste Transport	
F003			
F005			
U171			
	6600 Gallons	120	120

Expected Year of Closure: 1986

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AUG 19 1985
IEPA-DLPC

DANA CORPORATION

CLOSURE SCHEDULE

	<u>Working Days</u>
Final Closure Plan submission and approval by Illinois Environmental Protection Agency (IEPA)	60
Official closure notification Receipt of IEPA closure approval	10
Closure	90
Site inspection and testing	30
Certification	10
Notification of closure completion and certification transmission	<u>10</u>
Total	210

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AUG 19 1985

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CLOSURE COST ESTIMATE

Per 725.212

Remove maximum inventory of 55 gallon drums from site. 120 at 120.60 per part 725	\$14,472.00
De-contaminate site and closure equipment per 725.211	
Labor: Supervisor (working) 16 hours at 35.00/hour	560.00
Laborer 16 hours at 25.50/hour	408.00
Materials: (6) Drums at 17.50 each	105.00
Detergent	N/C
Equipment: Steam Cleaner (2) days at 250.00/day	500.00
Wastewater Removal: (6) Drums at 75.00/Drum	450.00
Engineering, Supervision, Testing and Certification per 725.215	5,100.00
	<u>\$21,595.00</u>
Total Estimated Closure Cost	<u>= \$22,000.00</u>

Note:

Site testing for traces of contaminants that were stored on site, if necessary for certification and assurance per 725.211, will be performed. Sampling and analysis will be performed using the latest, most applicable ASTM, EPA or Standard Methods procedures.

Hazardous Compounds: F001, F002, F005, U171

gabriel and assc iates

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AUG 19 1985

IEPA-DLPC

VICTOR PRODUCTS DIVISION • CHICAGO PLANT

REPLY TO: P.O. BOX 1033 • CHICAGO, ILLINOIS 60650

Telephone: 312-287-6180 • Telex: 25-3051



DANA CORPORATION

May 17, 1985

Nicholas J. Malone
Gabriel and Associates
1814 N. Marshfield Avenue
Chicago, Illinois 60622

SUBJECT: Withdrawal from the TSD Program
Cicero/Dana Corp. Victor Products Div.
ILD068469386

Dear Mr. Malone:

Victor Products Division has obtained an acceptable quotation from American Waste Haulers to haul the organic solvents wastes stored at the current temporary storage facility at a frequency not to exceed 89 days. The increase in the haulage frequency is a response to our desire and intent to withdraw from the TSD program. Victor Products Division is currently prepared to issue a formal purchase order for the more frequent hauling. In fact, Victor Products Division is currently storing these wastes at this TSD facility for no more than 89 days.

Yours truly,

A handwritten signature in cursive script that reads "Richard J. Fraske".

Richard J. Fraske
Chief Facilities Engineer
VICTOR PRODUCTS DIV. DANA CORP.
5750 W. Roosevelt Road
Chicago, Illinois 60650
(312) 287-6180

RJF/1a

RECEIVED

AUG 19 1985

IEPA-DLPC

VICTOR PRODUCTS DIVISION • ROBINSON PLANT
REPLY TO • P.O. BOX 599 • ROBINSON, ILLINOIS 62454
TELEPHONE: 618-544-8651



DANA CORPORATION

May 17, 1985

Nicholas J. Malone
Gabriel and Associates
1814 N. Marshfield Avenue
Chicago IL 60622

RE: Withdrawal from TSD Program
Robinson Dana Corp, Victor Prod Div
ILDO 47074661

Dear Mr. Malone:

Victor Products Division has a verbal agreement with Ashland Chemical Company to haul the flammable waste liquids stored at the current temporary storage facility at a frequency not to exceed 89 days. The increase in the haulage frequency is a response to our desire and intent to withdraw from the TSD program. Victor Products Division is prepared to issue a formal purchase order for the more frequent hauling. Victor Products Division is prepared to begin storing these wastes at this TSD facility for no more than 89 days.

Regards,

Pat McVickar /dw

Pat McVickar
Facilities Engineer

PM/dw

RECEIVED
AUG 19 1985
IEPA-D

Subject DANA CORPORATION - VICTOR PRODUCTS DIV

Data _____

Reviewed by EWBDate FEB 14, 1985

NM

0310510003 -- Cook County
Cicero/Dana Corp - Victor Products Div.
ILD 068469386

FACE2

The following violations:

1. The closure performance standard is not given in the closure plan as required by 725.211(40CFR 265.111) - the owner or operator must close his facility in a manner that minimizes the need for further maintenance; and controls, minimizes or eliminates, to the extent necessary to protect human health and environment.
2. The closure plan does not give an estimated year of closure or a schedule for final closure as required by 725.212(a)(4) (40CFR 265.112(a)(4)) An estimate of the expected year of closure and a schedule for final closure.
3. The closure plan does not ^{give the tank sizes and the} ~~the~~ maximum inventory of wastes as required by 725.212(a)(2) (40CFR 265.112(a)(2)) An estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility.
4. The closure plan does not give the steps necessary to decontaminate the facility as required by 725.212(a)(3) (40CFR 265.112(a)(3)) A description of the steps necessary to decontaminate facility equipment during closure.
5. The step of certification is not given as required by 725.215(40CFR 265.115) When closure is completed the owner or operator must submit to the Director certification by both the owner or operator and by an independent registered certified engineer that the facility has been closed in accordance with the specifications in the approved closure plan.
6. The closure cost estimate is not itemized step by step as required by 725.242(40CFR 265.142) The owner or operator must prepare a written estimate, in current dollars, the cost of closing the facility in accordance with the closure plan.
7. The wrong USEPA I.D. No. is listed on the letter from Chief Financial Officer.
8. Failed to furnish Sudden Liability Insurance as required by 725.145(40CFR 265.147)

Subject DANA CORPORATION - Victor Products Div.

Data _____

Reviewed by END

Date Feb 12, 1985

NM 0310510003 -- Cook County
Licord/Victor Products (Dana Corp)
ILD 066469386

FH082

Closure plan - A Storage Facility
- place scrap into containers & label and ship by way of
an authorized hauler.
- clean & empty tanks

Closure plan is rejected due to the following reasons:

1. Closure performance standard is not given
2. The expected year of closure and a schedule is not given.
3. The tank sizes and maximum waste inventory is not given.
4. A description of the steps necessary to decontaminate
the facility are not given.
5. The step of closure certification is not given.

Closure cost estimate

\$22,000

Comparison

6. No detailed step by step closure costs are
given, therefore the closure cost estimate is rejected

7. The F.T. for this facility ~~is incorrect~~ ^{has wrong} USEPA I.D. No.

8. They have not furnished a sudden accidental occurrences
certificate of liability insurance.

4/1/85 - F.T. closure estimate 22,800 - Recommend P&EL per the
above deficiencies

DANA CORPORATION

ILD 068469386 Feb 14, 1985

ITEM CHECK

SUBJECT REQUIREMENT

COMMENTS/NOTES

- G. Closure Plans, Post-closure Plans and Financial Requirements (270.14(b)13, 264.110 thru 264.120)

G-1. Closure Plan (264.111-114)

A copy of the written closure plan consistent with G-1a through G-1f including an estimate of the maximum inventory of wastes in storage and treatment at any time. If changes in operating plans or facility design affect the closure plan or the expected year of closure changes, a modification of the closure plan is needed.

Storage only

ES (NO) N/A
g(s).

- (a) Closure Performance Standard
A description of how closure minimizes the need for post-closure maintenance and minimizes release of wastes.

ES (NO) N/A
g(s).

- (b) Partial and Final Closure Activities
If partial closure is anticipated, a description of how and when the facility will be partially closed, including an identification of the maximum extent of operation after partial closure. A description of how and when the facility will finally be closed.

No partial closure anticipated

ES (NO) N/A
g(s).

- (c) Maximum Waste Inventory
A description of the maximum inventory of wastes in storage and treatment.

No tank sizes or max. inventory

ES (NO) N/A
g(s).

- (d) Inventory Removal, Disposal or Decontamination of Equipment
A description of how all hazardous waste inventory will be removed and how all facility equipment and structures will be decontaminated or disposed of when closure is completed.

Steps necessary to decontaminate are not given

ES (NO) N/A
g(s).

- (e) Schedule for Closure
An estimate of the expected year of closure and schedule for final closure including total time to close the facility and time for closure activities. A schedule for closure which shows that all hazardous wastes will be treated, removed off-site or disposed of on-site within

*No year
No time schedule*

ITEM CHECK

SUBJECT REQUIREMENT

COMMENTS/NOTES

YES NO (N/A)
pg(s).

90 days from receipt of final volume of waste,
and that all closure activities will be
completed within 180 days from receipt of final
volume of waste.

(f) Extensions for Closure Time

A petition for a schedule for closure which
exceeds the 90 days for treatment, removal or
disposal of wastes and/or the 180 days for
completion of closure activities made to the
Regional Administrator.

YES NO (N/A)
pg(s).G-2 Post-closure Plans Documentation (See
appropriate check list for specific
requirements)

Applicable only for surface impoundments,
landfills, land treatment facilities, and waste
piles (264.117-118).

*Storage only*YES NO (N/A)
pg(s).(a) Description of ground water monitoring
activities and frequenciesYES NO (N/A)
pg(s).(b) Description of maintenance activities and
frequencies for;

- (i) Final containment structures
- (ii) Facility monitoring equipment

YES NO (N/A)
pg(s).(c) Location(s) and number of copies of post
closure planYES NO (N/A)
pg(s).(d) Identification and location (address and
phone number) of person responsible for
storage and updating of facility copy of
post-closure plan prior to closureYES NO (N/A)
pg(s).(e) Identification and location (address and
phone number) of person responsible for
storage and updating facility copy of post
closure plan during post-closure periodYES NO (N/A)
pg(s).(f) Procedure for updating all other copies of
post-closure plan

ITEM CHECK	SUBJECT REQUIREMENT	COMMENTS/NOTES
YES NO <u>N/A</u> pg(s).	G-3 Notice in Deed and Notice to Local Land Authority (existing facilities only) 264.119-120)	
YES NO <u>N/A</u> pg(s).	(a) Description of ground water monitoring activities and frequencies	
YES NO <u>N/A</u> (s).	(b) Description of maintenance activities and frequencies for; (i) Final containment structures (ii) Facility monitoring equipment	
YES NO <u>N/A</u> pg(s).	(c) Location(s) and number of copies of post closure plan	
YES <u>NO</u> N/A pg(s).	G-4 Closure Cost Estimate (270.14(b)(15), 264.142) A copy of the <u>most recent closure cost estimate</u> , calculated to cover the cost of closure when the cost would be greatest (not including partial closure). The cost must be updated annually using an inflation factor.	<i>No step by step (itemized)</i>
	G-5 Financial Assurance Mechanism for Closure (270.14(b) (15, 264.143, 264.151) A copy of the established financial assurance mechanism for facility closure. For facilities in Phase I authorized states, originally signed duplicates of executed instruments are not required until the time of permit issuance, except as required by local state law. The mechanism must be one of the following: (G-5(a) through G-5(f).)	
YES NO <u>N/A</u> pg(s).	(a) Closure Trust Fund A copy of the closure trust fund agreement with the wording required in 264.151(a)(1) and a formal certification of acknowledgement.	

EM CHECK SUBJECT REQUIREMENT COMMENTS/NOTES

(b) Surety Bond

ES NO (N/A)
g(s).

(1) Surety Bond Guaranteeing Payment Into a Closure Fund

A copy of the surety bond with the wording required in 264.151(b), a copy of the standby trust fund, and a written guarantee that the owner or operator will fund the standby fund at least 60 days before final closure begins and will provide alternate financial assurance if the bond is cancelled.

ES NO (N/A)
g(s).

(2) Surety Bond Guaranteeing Performance of Closure

A copy of the surety bond with the wording required in Part 264.151(c), guaranteeing that the owner or operator will perform closure according to the closure plan and the requirements of Subpart G, or that the owner or operator will fund the standby trust fund as in I-5b(1).

ES NO (N/A)
g(s).

(c) Closure Letter of Credit

A copy of the irrevocable letter of credit with the wording required in 264.161(d) and a copy of the standby trust fund. The letter of credit must be issued for a period of at least one year and be for the amount of estimated closure.

ES NO (N/A)
g(s).

(d) Closure Insurance

A noncancellable assignable insurance policy for the amount of estimated closure costs. The policy must provide that the insurance company will pay the cost of closure up to the full amount of the policy whenever closure occurs.

ES NO (N/A)
g(s).

(e) Financial Test and Corporate Guarantee

Test based on guarantor firm's most recent annual audited financial statements and taking into account current adjusted cost of closure and post-closure care in all facilities not covered by an alternative financial mechanism. Submit letter from Chief Financial Officer, accompanied by independent auditor's opinion and special report verifying the letter.

Used Act 17 year of 12/31/83
used used update 3/31/85
update received 3/25/85

ITEM CHECK	SUBJECT REQUIREMENT	COMMENTS/NOTES
YES NO <u>(N/A)</u> pg(s).	(f) <u>Combination</u>	
YES NO <u>(N/A)</u> pg(s).	(1) <u>Use of Multiple Financial Mechanisms</u> A copy of a combination of trust fund agreements, surety bond guaranteeing payment into a closure trust fund, letters of credit, closure insurance, or state guarantees which provide financial assurance for the amount of closure.	
YES NO <u>(N/A)</u> pg(s).	(2) <u>Use of Financial Mechanism for Multiple Facilities</u> A copy of a financial assurance mechanism for more than one facility showing, for each facility, the EPA ID number, name, address, and amount of fund for closure assured by the mechanism.	
YES NO <u>(N/A)</u> pg(s).	G-6 <u>Post-closure Cost Estimate (264.144 See requirements of G-5)</u> Applicable only for surface impoundments, landfills, land treatment facilities, and waste piles.	
YES NO <u>(N/A)</u> pg(s).	G-7 <u>Financial Assurance Mechanism for Post-closure (264.145-146) (See requirements of G-8)</u> Applicable only for surface impoundments, landfills, land treatment facilities, and waste piles.	
	G-8 <u>Liability Requirements (270.14(b)(17), 264.147, 264.151)</u> A copy of the Certificate of Insurance or other documentation which comprises compliance with the liability requirements of 264.147. Coverage is for all facilities owned and operated and applies until certification for closure is completed. For facilities in Phase I authorized states, originally signed duplicates of executed instruments or certificates of insurance are not required until the time of permit issuance, except as required by local state law.	

ITEM CHECK

SUBJECT REQUIREMENT

COMMENTS/NOTES

YES ☒ NO ☐ N/A ☐
pg(s).

- (a) Sudden Insurance
Coverage is required in the amount of \$1 million per sudden accidental occurrence with an annual aggregate of \$2 million. Supply a Certificate of Insurance or the Hazardous Waste Facility Liability Endorsement.

*Not furnished*YES ☐ NO ☒ N/A ☐
pg(s).

- (b) Nonsudden Insurance (Reserved)
Applicable only for surface impoundments, landfills or land treatment facilities.

*Not necessary*YES ☐ NO ☒ N/A ☐
pg(s).

- (c) Financial Test
Test based on firm's most recent annual audited financial statements and taking into account the amount of coverage not provided by other insurance or guarantees. Submit letter for Chief Financial Officer, accompanied by independent auditor's opinion and special report verifying the letter.

YES ☐ NO ☒ N/A ☐
pg(s).

- (d) Variance Procedures
Regional Administrator may approve reduction in liability coverage required, based on an evaluation of the degree and duration of risks and on other technical and engineering information.

YES ☐ NO ☒ N/A ☐
pg(s).

- (e) Adjustment Procedures
Regional Administrator may increase amounts of liability coverage required for any facility or group of facilities, or he may elect to impose nonsudden liability coverage requirements on treatment or storage facilities, based on an evaluation of the degree and duration of risks as deemed necessary to protect human health and the environment.



January 24, 1985

Illinois Environmental
Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Attention: Rana K. Chaturdedi

REFERENCE #0310510003 COOK COUNTY
CICERO - VICTOR PRODUCTS
#1LD068469386

Dear Rana,

Please find enclosed a copy of the Post Closure Plan filed March 16, 1982 with the E.P.A. Maywood office, as requested in your letter dated 12-21-84 to Clem Revetti.

Also enclosed is an update with change of plant manager and closure cost.

Please be advised that Clem Revetti will furnish other necessary documents.

Yours truly,

Richard J. Fraske
Chief Facilities Engineer
VICTOR PRODUCTS DIV. DANA CORP.
5750 W. Roosevelt Road
Chicago, Illinois 60650
(312) 287-6180

cc: Ron Budovec
Clem Revetti

RECEIVED

JAN 28 1985

IEPA-DLPC



DANA CORPORATION

GENERAL INFORMATION CLOSURE PLAN
CHICAGO PLANT

1. Owner: Dana Corporation
non-responsive
[REDACTED]
2. Operator: Victor Products Division
non-responsive
[REDACTED]
3. Plant Manager: Ron Budovec
non-responsive
[REDACTED]
4. Chief Facilities Engineer: R. J. Fraske
non-responsive
[REDACTED]
5. Type of Facility: Stamp and coat vehicular gaskets
6. Description of Activities:
 - (A) Stamp metal and composition parts
 - (B) Coating and curing (steam, gas, electric ovens) gaskets with water and solvent based liquid coatings
7. Implementation:
 - (A) To take inventory of each area that has hazardous waste, scrap and materials to be disposed of, put these materials in proper containers.
 - (B) Prepare them with proper labels and necessary documentation for shipment thru an authorized and licensed waste hauler and disposer.
 - (C) Notify all proper authorities of the closure six months in advance of any action taken.
 - (D) Inventory all chemicals and materials that may be sent back to vendors.
 - (E) Make preparations to return materials.
 - (F) To see that all tanks are emptied and cleaned.
 - (G) Estimated cost of closure on hazardous waste and materials is \$22,000.

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JAN 28 1985

IEPA-DLPC

R. J. Fraske

VICTOR PRODUCTS DIVISION • CHICAGO PLANT

REPLY TO • P.O. BOX 1333 • CHICAGO, ILLINOIS 60690

Telephone: 312-287-6180 • Telex: 25-3051



DANA CORPORATION

March 16, 1982

Illinois Environmental Protection Agency
Division of Land and Noise Control
1701 1st Avenue
Maywood, Illinois 60153

Attention: Mr. John P. Evans, Jr.

Dear Mr. Evans:

Enclosed please find a copy of the Closure Plan and estimated cost that you requested on your visit to Victor Products Division Dana Corporation on March 2, 1982.

The enclosed Closure Plan is for the Chicago plant of

Victor Products Division of Dana Corp.
5750 West Roosevelt Road
Chicago, Illinois 60650
(312) 287-6180

Yours truly,

Richard J. Fraske
Chief Facilities Engineer
VICTOR PRODUCTS DIV. DANA CORP.
5750 W. Roosevelt Road
Chicago, Illinois 60650
(312) 287-6180

RJF/1a

cc: D. J. Reda G. Austin
C. Hayden A. Babal
File

RECEIVED

JAN 28 1985

IEPA-DLPC



DANA CORPORATION

GENERAL INFORMATION CLOSURE PLAN
CHICAGO PLANT

1. Owner: Dana Corporation

non-
resp
onsi

2. Operator: Victor Products

non-
responsi
ve

3. Plant Manager: D. J. Reda

non-responsive

4. Chief Facilities Engineer: R. J. Fraske

non-
resp
onsi
ve

5. Type of Facility: Stamp and coat vehicular gaskets

6. Description of Activities:

- (A) Stamp metal and composition parts
- (B) Coating and curing (steam, gas, electric ovens) gaskets with water and solvent based liquid coatings

7. Implementation:

- (A) To take inventory of each area that has hazardous waste, scrap and materials to be disposed of, put these materials in proper containers.
- (B) Prepare them with proper labels and necessary documentation for shipment thru an authorized and licensed waste hauler and disposer.
- (C) Notify all proper authorities of the closure six months in advance of any action taken.
- (D) Inventory all chemicals and materials that may be sent back to vendors.
- (E) Make preparations to return materials.
- (F) To see that all tanks are emptied and cleaned.
- (G) Estimated cost of closure on hazardous waste and materials is \$10,000.00.

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JAN 28 1985

R. J. Fraske

IEPA-DLPC

Date: 7-9-85

Facility Name: Dana Corp.

Facility USEPA ID 068469386
ILD-~~047-074-661~~

Reviewer: Andy Vollmer

The response received from the facility on 6-28-85
as a result of our Compliance Inquiry Letter (CIL)/Pre-Enforcement
Conference Letter (PECL) dated 5-21-85 has been
reviewed. The result of the technical review is following:

1. The financial Test alternate II has not
been signed.
2. Failed to submit the estimate year of closure
3. Failed to provide info in paragraphs 3, 4,
5, 6 & 8 of the 5-14-85 PECL



CORPORATE OFFICES

RECEIVED

JUL 01 1985

June 25, 1985

IEFA-DLPC

Director
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

RECEIVED IN THE
OFFICE OF THE DIRECTOR

JUN 28 1985



Dear Sir:

Please find enclosed an executed letter from the Chief Financial Officer for liability coverage and closure/post closure cost estimates. This updates our previous filing for closure/post closure cost estimates only due to cancellation of insurance. Also included are Dana's annual report and an updated opinion from Price Waterhouse.

If you have any questions, please contact me at the address and/or phone number indicated herein.

Very truly yours,

Clement A. Revetti
Legal Counsel

CAR/mlc
Encl.
cc: N. Smith

LETTER FROM CHIEF FINANCIAL OFFICER

(To demonstrate liability coverage and/or to demonstrate both liability coverage and assurance of closure and/or post-closure care.)

Director
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

RECEIVED
JUL 01 1985

IEPA-DLPC

Dear Sir or Madam:

I am the chief financial officer of Dana Corporation

This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and assurance of closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265 and/or Subpart H of 35 Illinois Administrative Code Parts 724 and 725.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265 and/or tests equivalent or substantially equivalent, and/or Subpart H of 35 Illinois Administrative Code Parts 724 and 725:

USEPA I.D. No. See Attachment I

Name

Address

Please attach a separate page if more space is needed for all facilities.

See Instruction (4)

- This firm is the owner or operator of the following facilities for which financial assurance for closure and/or post-closure care is demonstrated through the financial test specified in Subpart H of 35 Ill. Adm. Code Parts 724 and 725. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: (LIST ALL THE ILLINOIS FACILITIES USING THE FINANCIAL TEST)

USEPA I.D. No.	Closure Amount	Post-Closure Amount	Closure and Post-Closure Amounts
(5)	(6)	(7)	(8)
<u>ILD 047074661</u>			
Name <u>Dana Corporation/Victor Products-Robinson</u>			
Address <u>South Eaton Rd., P.O. Box 599</u>	<u>\$13,500</u>	<u>\$13,500</u>	<u>\$27,000</u>
City <u>Robinson, IL 62454</u>			
<u>USEPA I.D. No. ILD 068469386</u>			
Name <u>Dana Corporation/Victor Products-Chicago</u>			
Address <u>5750 West Roosevelt Rd., P.O. Box 1333</u>	<u>\$22,800</u>	<u>\$-0-</u>	<u>\$22,800</u>
City <u>Chicago, IL 60690</u>			

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 35 Ill. Adm. Code Parts 724 and 725, the closure and post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for closure and/or post-closure care so guaranteed are shown for each facility: (LIST ALL THE ILLINOIS FACILITIES USING THE CORPORATE GUARANTEE)

Not Applicable

USEPA I.D. No. (5)	Closure Amount (6)	Post-Closure Amount (7)	Closure and Post-Closure Amounts (8)
Name			
Address			
City			
USEPA I.D. No.			
Name			
Address			
City			

Please attach a separate page if more space is needed for all facilities.

3. For states other than Illinois this owner or operator or guarantor is demonstrating financial assurance for the closure or post-closure care of the following facility through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: (LIST ALL FACILITIES WHICH ARE NOT IN ILLINOIS BUT ARE SUBJECT TO A STATE OR FEDERAL FINANCIAL ASSURANCE REQUIREMENT THAT ARE ASSURED BY A FINANCIAL TEST OR CORPORATE GUARANTEE)

USEPA I.D. No. (5)	Closure Amount (6)	Post-Closure Amount (7)	Closure and Post-Closure Amounts (8)
Name	Exhibit A attached hereto		
Address	for facilities outside state of Illinois		
City			
USEPA I.D. No.			
Name			
Address			
City			

Please attach a separate page if more space is needed for all facilities.

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is NOT demonstrated either to IEPA, USEPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent state mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: (LIST FACILITIES IN RCRA AUTHORIZED STATES WHERE THERE IS NO STATE FINANCIAL ASSURANCE REQUIREMENT)

USEPA I.D. No. (5)	Closure Amount (6)	Post-Closure Amount (7)	Closure and Post-Closure Amounts (8)
Name			
Address			
City			

USEPA ID No.

Name _____

Address _____

City _____

Please attach a separate page if more space is needed for all facilities.

This owner or operator is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the last fiscal year.
(9)

The fiscal year of this owner or operator ends on December 31 *. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1984.
(10)
(11)

Part A. Liability Coverage for Accidental Occurrences (See Instruction 12 and 13)

Alternative I

1. Amount of annual aggregate liability coverage to be demonstrated \$ N/A
- *2. Current assets \$ _____
- *3. Current liabilities \$ _____
4. Net working capital (line 2 minus line 3) \$ _____
- *5. Tangible net worth \$ _____
- *6. If less than 90% of assets are located in the U.S., give total U.S. assets \$ _____
- Yes No
7. Is line 5 at least \$10 million? / _____
8. Is line 4 at least 6 times line 1? / _____
9. Is line 5 at least 6 times line 1? / _____
- *10. Are at least 90% of assets located in the U.S.? / _____
If not, complete line 11.
11. Is line 6 at least 6 times line 1? / _____

Signature _____

Typed name _____

Title _____

Date _____

Part A. Liability Coverage for Accidental Occurrences (See Instruction 12 and 13)

Alternative II

1. Amount of annual aggregate liability coverage to be demonstrated \$ N/A
2. Current bond rating of most recent issuance and name of rating service _____
3. Date of issuance of bond _____
4. Date of maturity of bond _____
- *5. Tangible net worth \$ _____
- *6. Total assets in U.S. (required only if less than 90% of assets are located in U.S.) \$ _____
- Yes No
7. Is line 5 at least \$10 million? / _____
8. Is line 5 at least 6 times line 1? / _____
- *9. Are at least 90% of assets located in the U.S.? / _____
If not, complete line 10.
10. Is line 6 at least 6 times line 1? / _____

Signature _____

Typed name _____

Title _____

Date _____

Alternative I

1. Sum of current closure and post-closure cost estimates (total of all cost estimates listed above)	\$	N/A
2. Amount of annual aggregate liability coverage to be demonstrated	\$	
3. Sum of lines 1 and 2	\$	
*4. Total liabilities (if any portion of your closure or post-closure cost estimates is included in your total liabilities, you may deduct that portion from this line and add that amount to lines 5 and 6)	\$	
*5. Tangible net worth	\$	
*6. Net worth	\$	
*7. Current assets	\$	
*8. Current liabilities	\$	
9. Net working capital (line 7 minus line 8)	\$	
*10. The sum of net income plus depreciation, depletion, and amortization	\$	
*11. Total assets in U.S. (required only if less than 90% of assets are located in the U.S.)	\$	

	Yes	No
12. Is line 5 at least \$10 million?	/	
13. Is line 5 at least 6 times line 3?	/	
14. Is line 9 at least 6 times line 3?	/	
*15. Are at least 90% of assets located in the U.S.? If not, complete line 16.	/	
16. Is line 11 at least 6 times line 3?	/	
17. Is line 4 divided by line 6 less than 2.0?	/	
18. Is line 10 divided by line 4 greater than 0.1?	/	
19. Is line 7 divided by line 8 greater than 1.5?	/	

Signature

Robert E. Byrket

Typed name

Robert E. Byrket

Title

Chief Financial Officer

Date

June 26, 1985

See Chart on other side.

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JUL 01 1985

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Part B. Closure or Post-Closure Care and Liability Coverage (See Instructions 14 and 15)

Alternative II

1. Sum or current closure and post-closure cost estimates (total of all cost estimates listed above)	\$ 1,052,854
2. Amount of annual aggregate liability coverage to be demonstrated	\$ 2,000,000
3. Sum of lines 1 and 2	\$ 3,052,854
4. Current bond rating of most recent issuance and name of rating service	S&P A Moody's A2
5. Date of issuance of bond	6-15-81
6. Date of maturity of bond	6-15-2006
*7. Tangible net worth (if any portion of the closure or post-closure cost estimates is included in "total liabilities" on your financial statements you may add that portion to this line)	\$ 1,116,000,000
*8. Total assets in the U.S. (required only if less than 90% of assets are located in the U.S.)	\$ 2,002,000,000
	Yes No
9. Is line 7 at least \$10 million?	X /
10. Is line 7 at least 6 times line 3?	X /
*11. Are at least 90% of assets located in the U.S.? If not, complete line 12.	/ X
12. Is line 8 at least 6 times line 3?	X /

Signature

Typed name

Robert E. Byrket

Title

Chief Financial Officer

Date

June 20, 1985

ATTACHMENT 1

Dana Corporation
Victor Products Division
Robinson Gasket Plant
S. Eaton Road
P.O. Box 599
Robinson, Illinois 62454
ID# ILD 047 074 661

Dana Corporation
Victor Products Division
Chicago Gasket Plant
5750 W. Roosevelt Road
P.O. Box 1333
Chicago, Illinois 60690
ID# ILD 068 469 386

EXHIBIT A

Dana Corporation
Spicer Transmission division
4100 Bennett Road
P.O. Box 986
Toledo, Ohio 43696
ID#-OHD 052 813 540
Closure - \$64,000
Post-closure - \$-0-

Dana Corporation
Lantex Hydraulic
600 West Beltline Road
P.O. Drawer 340
Lancaster, Texas 75146
ID#-TXD 007 365 729
Closure - \$5,986
Post-closure -\$0-

Dana Corporation
Perfect Circle Division
1900 Summit
P.O. Box 2027
Hastings, Nebraska 68901
ID#-NED 091 998 567
Closure - \$24,000
Post-closure -\$0-

Dana Corporation
Spicer Axle Division
Fort Wayne Plant
2100 West State Blvd.
P.O. Box 750
Fort Wayne, Indiana 46801
ID#-IND 005 470 885
Closure -\$11,025
Post-closure -\$0-

Dana Corporation
Boston Industrial Products
P.O. Box 500
Hohenwald, Tennessee 38462
ID#-IND 004 045 605
Closure - \$206,700
Post-closure - \$232,140

Dana Corporation
Tyrone Hydraulics
Corner of Fulton and Golding Drives
P.O. Box 511
Corinth, Mississippi 38834
ID#-MSD 007 020 043
Closure - \$11,024
Post-closure - \$16,536

Dana Corporation
Spicer Transmission Division
4929 Krueger Drive
Jonesboro, Arkansas
ID#-ARD 097 908 461
Closure - \$552
Post-closure -\$1,103

Dana Corporation
Weatherhead Division
203 Weatherhead Street
Angola, Indiana 46703
ID#-IND 005 480 942
Closure - \$295,910
Post-closure -\$0-

Dana Corporation
Weatherhead Division
West Ellsworth Street
P.O. Box 131
Columbia City, Indiana 46725
ID#-IND 000 804 781
Closure - \$44,096
Post-closure - \$0-

Dana Corporation
Weatherhead Division
U.S. Route 24
Antwerp, Ohio 45813
ID#-OHD 005 039 730
Closure - \$11,690
Post-closure - \$78,292



1600 NATIONAL BANK BUILDING
606 MADISON AVENUE
TOLEDO, OHIO 43604
419 255-2760

June 21, 1985

Mr. Robert E. Byrket
Executive Vice President,
Chief Administrative Officer
and Chief Financial Officer
Dana Corporation
4500 Dorr Street
Toledo, Ohio 43615

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JUL 01 1985

IEPA-DLPC

Dear Mr. Byrket:

We have examined the consolidated balance sheet of Dana Corporation and its Consolidated Subsidiaries as of December 31, 1984 and the related consolidated statements of income, of shareholders' equity and of changes in financial position for the year then ended. Our examination was made in accordance with generally accepted auditing standards and accordingly included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances. Our report thereon appears on page 32 of Dana's Annual Report.

In connection with your letter to various State Administrators of Environmental Protection, we compared "Tangible net worth" of \$1,116 million (shareholders' equity of \$1,223 million less goodwill of \$107 million) indicated in item 7 and "Total assets in U.S." of \$2,002 million (which includes \$138 million investment in foreign affiliates and \$15 million intercompany accounts) in item 8 to the corresponding amounts in the audited financial statements or supporting schedules from which such amounts were derived and found such amounts to be in agreement.

Yours very truly,

Price Waterhouse

1814 north marshfield
chicago, illinois 60622
(312) 486-2123

June 3, 1985

Michael F. Nechvatal
Manager
Compliance Monitoring Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, IL 62706

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JUN 06 1985

IEPA-DLPC

Subject: Post Conference Follow-up Cicero, Robinson/Dana Corporation
ILD 068469386, ILD 047074661

Dear Mr. Nechvatal:

On Tuesday May 21, 1985, Gabriel and Associates (Representative for the Dana Corporation) met with staff members of the Illinois Environmental Protection Agency (IEPA) to confer about the elimination of all current and future alleged violations at the Cicero and Robinson Facilities. A preliminary schedule for a compliance program and closure of the manufacturing plants as Treatment, Storage and Disposal Facilities was presented at the conference. This schedule was amended at the conference, a revised copy of which is enclosed.

Also discussed and agreed upon was that Dana Corporation would submit the required Sudden Liability Insurance documentation within fifteen working days (June 12, 1985). Upon submission and approval of the Sudden Liability Insurance documentation and the closure plan for both facilities as scheduled; Dana Corporation will have fulfilled all of the IEPA requirements and requests on this matter.

Very truly yours,



Nicholas J. Malone
Engineering Manager

Gabriel & Associates

NJM/pq/m2

Enclosure

cc: Mr. Clement A. Revetti
Dana Corporation

JUN 06 1985

JUN 06 1985

DANA CORPORATIONCOMPLIANCE SCHEDULE

	<u>Working Days</u>
Complete sites evaluation and de-contamination procedure development	20
Closure Plans development and approval by Dana	15
Closure Plans submission and approval by Illinois Environmental Protection Agency (IEPA)	90
Official closure notification	5
Closure	90
Site inspection and testing	20
Certification	3
Notification of closure completion and certification transmission	<u>2</u>
Total	245



RISK MANAGEMENT SERVICES, INC.

May 7, 1985

Mr. Michael F. Nechuatal
Compliance Monitoring Section
Division of Land Pollution Control
Illinois EPA
2200 Churchill Road
Springfield, IL 62706

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MAY 10 1985

EPA-DLPC

RE: Dana Corporation
Environmental Impairment
Liability Insurance

Dear Mr. Nechuatal,

In reference to the Environmental Impairment Liability insurance that Dana Corporation had in effect for our facilities located in Illinois which covered gradual and non-sudden occurrences, please be advised that we were unable to obtain renewal coverage on the renewal date of 5/1/85. We had been in negotiations with the single insurance carrier that offered this coverage, but the terms and conditions that we received from the carrier late last week were unacceptable in their excessive restriction of coverage. Therefore, Dana Corporation is going to self-insure this exposure.

To that end, I am advising you that we will be submitting to you the appropriate documents requesting approval for self-insurance for gradual and non-sudden occurrences. This information will be forwarded to you as soon as it is compiled, but no later than May 31, 1985.

If you have any questions or comments about this, please contact me.

Best Regards,

Norm Smith

Norm Smith

NS/la



217/782-6762

Refer to: 0310510003 -- Cook County
Cicero/Dana Corp.
ILD068469386

0338080007 -- Crawford County
Robinson/Dana Corp.
ILD047074661

April 26, 1985

Ms. Evelyn J. Kovalich
Hylant, Maclean Insurance
711 First Federal Plaza
P. O. Box 1687
Toledo, Ohio 43603

Dear Ms. Kovalich:

This is in response to the Certificate of Insurance which was sent on April 17, 1985 and received on April 22, 1985.

This is to inform you that the Certificate, as submitted, cannot be accepted. The State of Illinois has specific forms which must be used.

We are enclosing the State of Illinois forms for your use, and we would like to inform you that you must submit the original form with the original ink signatures. Photocopies will not be accepted.

If you have any questions, or if we can be of assistance, please do not hesitate to contact us.

Very truly yours,

Andrew A. Vollmer
Financial Assurance
Permit Program Development Unit
Permit Section
Division of Land Pollution Control

AAV:tk/31

Enclosures

cc: Southern Region
Northern Region
Division File /



April 18, 1985

Mr. Bur Filson
Illinois E.P.A.
Division of Land Pollution Control
2200 Churchill Road
Springfield, IL 62706

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APR 19 1985

Re: 0338080007 - Crawford County
Robinson/Dana Corp.-Victor Products Div.
ILD 047074661
AND
0310510003 - Cook County
Cicero/Dana Corp. - Victor Products Div.
ILD 068469386

IEPA-DLPC

Dear Mr. Filson:

As promised in our phone conversation yesterday, I am providing a brief summary of my comments in that conversation and our immediate plans for responding to your letters of April 10, 1985 to the above referenced plants.

(1) On January 2, 1985, the above plants received a letter dated December 21, 1984 from Lawrence Eastep. It stated that they (a) had failed to provide financial assurance as required by Subtitle G 725.243 (40 CFR 265.143), (b) had failed to submit closure/post closure plans and cost estimates as required under Subtitle G 725.174 (40 CFR 265.74), (c) had failed to respond to your letter of March 3, 1984.

(2) I immediately called Mr. Chaturvedi, per Mr. Eastep's request and made arrangements with Mr. Chaturvedi to comply with Illinois E.P.A.'s most recent request. I pointed out to Mr. Chaturvedi that I thought our May 9, 1984 letter settled the matter because I had not heard from Illinois E.P.A.

(3) On January 24, 1985, I submitted a revised financial assurance for 1984 on Illinois' form. Note that Illinois should have received a timely financial assurance letter in March, 1984 but on a federal as opposed to state form. The error was inadvertent, as explained to Mr. Chaturvedi.

(4) On or about January 24, 1985, the plants submitted under separate cover their closure plans for 1985.

The above chronology is noted to be sure that you have all the documents in your file as well as to indicate our good faith effort to comply with Illinois statutes in this area. I must admit that the Pre-Conference Letter surprised us. In light of the above please be advised that:

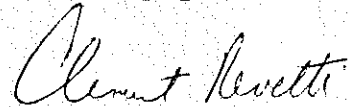
(a) the Hartford Insurance Company was asked on April 17, 1985 to immediately issue proof of insurance for sudden liability. If it had not been provided before, I do not know why but Dana was under the impression such proof had been provided in the past. In any event, I believe this will satisfy Paragraph 5 in Attachment A to the Robinson Pre-Enforcement Conference Letter ("Letter") and Paragraph 8 in Attachment A to the Cicero Letter.

(b) With respect to Paragraph 7 in Attachment A to the Cicero letter, I have attached a new financial assurance with the Cicero plant's ID number properly inserted. You will note that it was an inadvertent transposition typing error. This should ameliorate this problem.

(c) Regarding the closure plans for both plants, Mr. McVickar at the Robinson plant and Mr. Friske at the Cicero plant are undertaking the process of revamping their respective closure plans to meet the notations in Attachment A. To complete the task they will need two weeks to do so as well as additional time to secure a certification from an independent registered certified engineer.

In view of the above, I am asking that the Conference scheduled for May 3rd be cancelled and held no sooner than May 14, 1985. Mr. McVickar and Mr. Friske would prefer to send to you all the documents required by Mr. Nechvatal's letter before the pre-enforcement conference or perhaps cancel it because the points currently at issue will have become moot. I will contact you next week for an update.

Very truly yours,



Clement A. Revetti
Legal Counsel

CAR/mlc

Att.

cc: P. McVickar (Robinson)
R. Friske (Cicero)

FEDERAL EXPRESS

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APR 19 1985

IEPA-DLPG

LETTER FROM CHIEF FINANCIAL OFFICER

Assurance of closure and/or post-closure care

Director
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

RECEIVED
APR 19 1985
IEPA-DLPC

Dear Sir or Madam:

I am the chief financial officer of Dana Corporation

(1)

This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265 and/or Subpart H of 35 Illinois Administrative Code Parts 724 and 725.

See Instruction (2)

1. This firm is the owner or operator of the following facilities for which financial assurance for closure and/or post-closure care is demonstrated through the financial test specified in Subpart H of 35 Ill. Adm. Code Parts 724 and 725. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: (LIST ALL THE ILLINOIS FACILITIES USING THE FINANCIAL TEST)

<u>USEPA I.D. No.</u> <u>ILD 068 469 386</u>	<u>Closure Amount</u>	<u>Post-Closure Amount</u>	<u>Closure and Post-Closure Amounts</u>
(3)	(4)	(5)	(6)
<u>Name</u> <u>Dana Corp.-Victor Products Division</u>			
<u>Address</u> <u>5750 West Roosevelt Rd.</u>	22,800	-	22,800
<u>City</u> <u>Chicago, IL 60690</u>			

<u>USEPA I.D. No.</u> <u>ILD 047 074 661</u>			
<u>Name</u> <u>Dana Corp. - Victor Products Division</u>			
<u>Address</u> <u>South Eaton Rd.</u>	13,500	13,500	27,000
<u>City</u> <u>Robinson, IL 62454</u>			

Please attach a separate page if more space is needed for all facilities.

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 35 Ill. Adm. Code Parts 724 and 725, the closure and/or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for closure and/or post-closure care so guaranteed are shown for each facility: (LIST ALL THE ILLINOIS FACILITIES USING THE CORPORATE GUARANTEE)

<u>USEPA I.D. No.</u> <u>Not applicable</u>	<u>Closure Amount</u>	<u>Post-Closure Amount</u>	<u>Closure and Post-Closure Amounts</u>
(3)	(4)	(5)	(6)
<u>Name</u>			
<u>Address</u>			
<u>City</u>			

<u>USEPA I.D. No.</u>			
<u>Name</u>			
<u>Address</u>			
<u>City</u>			

Please attach a separate page if more space is needed for all facilities.

This Agency is authorized to require this information under Illinois Revised Statutes, 1981, Chapter 111 1/2, Section 21 (f). Disclosure of this information is required. Failure to do so may result in a civil penalty not to exceed \$25,000 per day of violation. Falsification of this information may constitute a Class 4 felony, which also carries a fine of up to \$25,000 per day of violation for the first offense. This form has been approved by the Forms Management Center.

3. For states other than Illinois this firm, owner or operator or guarantor, is demonstrating financial assurance for the closure and/or post-closure care of the following facilities through use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: (LIST ALL FACILITIES WHICH ARE NOT IN ILLINOIS BUT ARE SUBJECT TO A STATE OR FEDERAL FINANCIAL ASSURANCE REQUIREMENT THAT ARE ASSURED BY A FINANCIAL TEST OR CORPORATE GUARANTEE)

USEPA I.D. No. <u>See Attached.</u> (3)	Closure Amount (4)	Post-Closure Amount (5)	Closure and Post-Closure Amounts (6)
Name _____			
Address _____			
City _____			
USEPA I.D. No. _____			
Name _____			
Address _____			
City _____			

Please attach a separate page if more space is needed for all facilities.

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is NOT demonstrated either to IEPA, USEPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent state mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: (LIST FACILITIES IN RCRA AUTHORIZED STATES WHERE THERE IS NO STATE FINANCIAL ASSURANCE REQUIREMENT)

USEPA I.D. No. <u>Not Applicable</u> (3)	Closure Amount (4)	Post-Closure Amount (5)	Closure and Post-Closure Amounts (6)
Name _____			
Address _____			
City _____			
USEPA I.D. No. _____			
Name _____			
Address _____			
City _____			

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APR 19 1985

IEPA/DI/PC

Please attach a separate page if more space is needed for all facilities.

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31 *. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended 1984.

(9)

Alternative I

1. Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the four paragraphs above)	\$	_____
*2. Total liabilities (if any portion of the closure or post-closure cost estimates is included in total liabilities, you may deduct the amount of that portion from this line and add that amount to lines 3 and 4)	\$	_____
*3. Tangible net worth	\$	_____
*4. Net worth	\$	_____
*5. Current assets	\$	_____
*6. Current liabilities	\$	_____
7. Net working capital (line 5 minus line 6)	\$	_____
*8. The sum of net income plus depreciation, depletion, and amortization	\$	_____
*9. Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.)	\$	_____

	Yes	No
10. Is line 3 at least \$10 million?	_____	/_____
11. Is line 3 at least 6 times line 1?	_____	/_____
12. Is line 7 at least 6 times line 1?	_____	/_____
*13. Are at least 90% of firm's assets located in the U.S.?	_____	/_____
If not, complete line 14.		
14. Is line 9 at least 6 times line 1?	_____	/_____
15. Is line 2 divided by line 4 less than 2.0?	_____	/_____
16. Is line 8 divided by line 2 greater than 0.1?	_____	/_____
17. Is line 5 divided by line 6 greater than 1.5?	_____	/_____

Signature _____

Typed name _____

Title _____

Date _____

RECEIVED
APR 19 1985
IEPA-DLPC

Alternative II

1. Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the four paragraphs above) \$ 1,052,854
2. Current bond rating of most recent issuance of this firm and name of rating service Moody's A2 S & P A
3. Date of issuance of bond 6-15-1981
4. Date of maturity of bond 6-15-2006
- *5. Tangible net worth (if any portion of the closure and post-closure cost estimates is included in "total liabilities" on your firm's financial statements, you may add the amount of that portion to this line) \$ 1,116,000,000
- *6. Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.) \$ 2,002,000,000
- | | Yes | No |
|--|----------|----------|
| 7. Is line 5 at least \$10 million? | <u>X</u> | / |
| 8. Is line 5 at least 6 times line 1? | <u>X</u> | / |
| *9. Are at least 90% of firm's assets located in the U.S.? | | <u>X</u> |
| If not, complete line 10. | | |
| 10. Is line 6 at least 6 times line 1? | <u>X</u> | / |

Signature

Typed name

Title

Date

Robert E. ByrketRobert E. ByrketChief Financial Officer1-23-85

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APR 19 1985
IEPA-DLPC

Dana Corporation
Spicer Axle Division
Fort Wayne Plant
2100 West State Blvd.
P.O. Box 750
Fort Wayne, Indiana 46801
ID#-IND 005 470 885
Closure - \$11,025
Post-closure -\$0-

Dana Corporation
Boston Industrial Products
P.O. Box 500
Hohenwald, Tennessee 38462
ID#-IND 004 045 605
Closure - \$206,700
Post-closure - \$232,140

Dana Corporation
Tyrone Hydraulics
Corner of Fulton and Golding Drives
P.O. Box 511
Corinth, Mississippi 38834
ID#-MSD 007 020 043
Closure - \$11,024
Post-closure - \$16,536

Dana Corporation
Spicer Transmission Division
4929 Krueger Drive
Jonesboro, Arkansas
ID#-ARD 097 908 461
Closure - \$552
Post-closure - \$1,103

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APR 19 1985

IEPA-DLPC

Dana Corporation
Weatherhead Division
203 Weatherhead Street
Angola, Indiana 46703
ID#-IND 005 480 942
Closure - \$295,910
Post-closure -\$0-

Dana Corporation
Weatherhead Division
West Ellsworth Street
P.O. Box 131
Columbia City, Indiana 46725
ID#-IND 000 804 781
Closure - \$44,096
Post-closure -\$0-

Dana Corporation
Weatherhead Division
U.S. Route 24
Antwerp, Ohio 45813
ID#-OHD 005 039 730
Closure - \$11,690
Post-closure - \$78,292

Dana Corporation
Spicer Transmission Division
4100 Bennett Road
P.O. Box 986
Toledo, Ohio 43696
ID#-OHD 052 813 540
Closure - \$64,000
Post-closure \$-0-

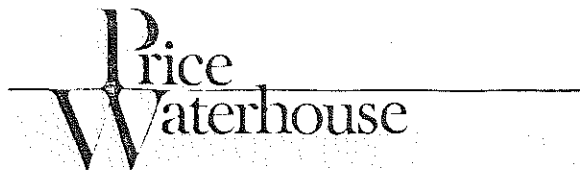
Dana Corporation
Lantex Hydraulic
600 West Beltline Road
P.O. Drawer 340
Lancaster, Texas 75146
ID#-TXD 007 365 729
Closure - \$5,986
Post-closure -\$0-

Dana Corporation
Perfect Circle Division
1900 Summit
P.O. Box 2027
Hastings, Nebraska 68901
ID#-NED 091 998 567
Closure - \$24,000
Post-closure -\$0-

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APR 19 1985

IEPA-DLPC



1600 NATIONAL BANK BUILDING
606 MADISON AVENUE
TOLEDO, OHIO 43604
419 255-2760

March 18, 1985

Mr. Robert E. Byrket
Executive Vice President,
Chief Administrative Officer
and Chief Financial Officer
Dana Corporation
4500 Dorr Street
Toledo, Ohio 43615

RECEIVED

APR 19 1985

IEPA-DLPC

Dear Mr. Byrket:

We have examined the consolidated balance sheet of Dana Corporation and its Consolidated Subsidiaries as of December 31, 1984 and the related consolidated statements of income, of shareholders' equity and of changes in financial position for the year then ended. Our examination was made in accordance with generally accepted auditing standards and accordingly included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances. Our report thereon appears on page 32 of Dana's Annual Report.

In connection with your letter to the Regional Administrator of the Environmental Protection Agency, we compared "Tangible net worth" of \$1,116 million (shareholders' equity of \$1,223 million less goodwill of \$107 million) indicated in item 5 and "Total assets in U.S." of \$2,002 million (which includes \$138 million investment in foreign affiliates and \$15 million intercompany accounts) in item 6 to the corresponding amounts in the audited financial statements or supporting schedules from which such amounts were derived and found such amounts to be in agreement.

Yours very truly,

Price Waterhouse

April 17, 1985

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APR 22 1985

IEPA-DLPC

Mr. Michael F. Nechvatal, Mgr.
Compliance Monitoring Section
Division of Land Pollution Control
Illinois EPA
2200 Churchill Road
Springfield, IL 62706

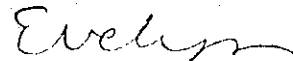
CERTIFICATE OF INSURANCE

Mr. Nechvatal,

Enclosed please find a Certificate of Insurance evidencing the coverage provided for Victor Gasket which is a Division of Dana Corporation for Sudden Accidental Insurance in regards to Pollution or Hazardous Waste Materials.

I trust you will find the enclosed in order; however, should you have any questions, please don't hesitate to give me a call. Thanks.

Sincerely,



Evelyn J. Kovalich

ejk
encl

HAZARDOUS WASTE FACILITY
CERTIFICATE OF LIABILITY INSURANCE

RECEIVED

APR 22 1985

IEPA-DLPC

1. Name of Insurer: Hartford Accident & Indemnity
Address of Insurer: 6161 Oaktree Blvd.
Independence, Ohio 44131

hereby certifies that it has issued liability insurance covering bodily injury and property damage to:

Dana Corporation and/or any Subsidiary or Affiliated Company
Name of Insured: including Victor Gasket
Address of Insured: 4500 Dorr Street
Toledo, OH 43697

in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at (Various Locations - See Below) for "sudden accidental occurrences." The limits of liability are \$1,000,000. each occurrence and \$2,000,000. annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number 45CLRP10072E issued on 6/29/84. The effective date of said policy is 6/1/84.

2. The insurer further certifies the following with respect to the insurance described in Paragraph 1:

- (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
- (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f).
- (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
- (d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.
- (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

SCHEDULE

NAME OF FACILITY

ADDRESS OR LOCATION

EPA
IDENTIFICATION
NUMBER

Victor Gasket

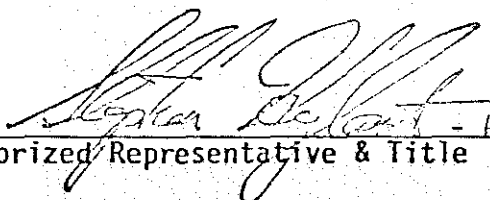
5750 W. Roosevelt Rd.
Chicago, IL 60690

ILD068469386

Victor Gasket

South Eaton Road
P O Box 599
Robinson, IL 62454

ILD047074661


Authorized Representative & Title

(Type Name) Steven T. Hylant

Name of Insurer Hartford Accident & Indemnity

Address of Insurer 6161 Oaktree Blvd.
Independence, OH 44131



CORPORATE OFFICES

March 21, 1985

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MAR 25 1985

IEPA-DLPG

Director
Illinois EPA
2200 Churchill Rd.
Springfield, Illinois 62706

Re: Closure/Post-Closure Cost Estimates
Dana Corporation - Victor Products Div. (Chicago)
Dana Corporation - Victor Products Div. (Robinson)

Dear Sir:

Please find enclosed Dana's Closure/Post Closure Cost Estimates for this year as well as an opinion from Price Waterhouse, its independent auditors relating to same a one copy of Dana's annual report.

If you should have any questions, please call me at 419-535-4792.

Very truly yours,

Clement A. Revetti
Legal Counsel

CAR/mlc
Encl.

cc: D. Owens (Robinson, IL)
R. Fraske (Chicago, IL)

LETTER FROM CHIEF FINANCIAL OFFICER

(Assurance of closure and/or post-closure care)

Director
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

RECEIVED

MAR 25 1985

IEPA-DLPC

Dear Sir or Madam:

I am the chief financial officer of Dana Corporation

(1)

This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265 and/or Subpart H of 35 Illinois Administrative Code Parts 724 and 725.

See Instruction (2)

1. This firm is the owner or operator of the following facilities for which financial assurance for closure and/or post-closure care is demonstrated through the financial test specified in Subpart H of 35 Ill. Adm. Code Parts 724 and 725. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: (LIST ALL THE ILLINOIS FACILITIES USING THE FINANCIAL TEST)

USEPA I.D. No. (3)	Closure Amount (4)	Post-Closure Amount (5)	Closure and Post-Closure Amounts (6)
ILD 068 469 368			
Name <u>Dana Corp.-Victor Products Division</u>			
Address <u>5750 West Roosevelt Rd.</u>	<u>22,800</u>	<u>-</u>	<u>22,800</u>
City <u>Chicago, IL 60690</u>			

USEPA I.D. No. ILD 047 074 661

Name <u>Dana Corp. - Victor Products Division</u>			
Address <u>South Eaton Rd.</u>	<u>13,500</u>	<u>13,500</u>	<u>27,000</u>
City <u>Robinson, IL 62454</u>			

Please attach a separate page if more space is needed for all facilities.

2. This firm guarantees, through the corporate guarantee specified in Subpart H of 35 Ill. Adm. Code Parts 724 and 725, the closure and/or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for closure and/or post-closure care so guaranteed are shown for each facility: (LIST ALL THE ILLINOIS FACILITIES USING THE CORPORATE GUARANTEE)

USEPA I.D. No. (3)	Closure Amount (4)	Post-Closure Amount (5)	Closure and Post-Closure Amounts (6)
<u>Not applicable</u>			
Name _____			
Address _____			
City _____			
USEPA I.D. No. _____			
Name _____			
Address _____			
City _____			

Please attach a separate page if more space is needed for all facilities.

This Agency is authorized to require this information under Illinois Revised Statutes, 1981, Chapter 111 1/2, Section 2100. Disclosure of this information is required. Failure to do so may result in a civil penalty not to exceed \$25,000 per day of violation. Falsification of this information may constitute a Class 4 felony, which also carries a fine of up to \$25,000 per day of violation for the first offense. This form has been approved by the Forms Management Center.

USEPA I.D. No. See Attached.

(3)

Closure
Amount
(4)

Post Closure
Amount
(5)

Closure and
Post Closure
Amounts
(6)

Name

Address

City

USEPA I.D. No.

Name

Address

City

Please attach a separate page if more space is needed for all facilities.

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is *NOT* demonstrated either to IEPA, USEPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent state mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: (LIST FACILITIES IN RCRA AUTHORIZED STATES WHERE THERE IS NO STATE FINANCIAL ASSURANCE REQUIREMENT)

USEPA I.D. No. Not Applicable

(3)

Closure
Amount
(4)

Post-Closure
Amount
(5)

Closure and
Post-Closure
Amounts
(6)

Name

Address

City

USEPA I.D. No.

Name

Address

City

Please attach a separate page if more space is needed for all facilities.

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

(7)

The fiscal year of this firm ends on December 31 *. The figures for the following items marked with an asterisk are derived from this

(8)

firm's independently audited, year-end financial statements for the latest completed fiscal year, ended 1984.

(9)

Alternative I

1. Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the four paragraphs above) \$ _____
- *2. Total liabilities (if any portion of the closure or post-closure cost estimates is included in total liabilities, you may deduct the amount of that portion from this line and add that amount to lines 3 and 4) \$ _____
- *3. Tangible net worth \$ _____
- *4. Net worth \$ _____
- *5. Current assets \$ _____
- *6. Current liabilities \$ _____
7. Net working capital (line 5 minus line 6) \$ _____
- *8. The sum of net income plus depreciation, depletion, and amortization \$ _____
- *9. Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.) \$ _____
- | | Yes | No |
|---|---------------|---------------|
| 10. Is line 3 at least \$10 million? | _____ / _____ | _____ / _____ |
| 11. Is line 3 at least 6 times line 1? | _____ / _____ | _____ / _____ |
| 12. Is line 7 at least 6 times line 1? | _____ / _____ | _____ / _____ |
| *13. Are at least 90% of firm's assets located in the U.S.? | _____ / _____ | _____ / _____ |
| If not, complete line 14. | | |
| 14. Is line 9 at least 6 times line 1? | _____ / _____ | _____ / _____ |
| 15. Is line 2 divided by line 4 less than 2.0? | _____ / _____ | _____ / _____ |
| 16. Is line 8 divided by line 2 greater than 0.1? | _____ / _____ | _____ / _____ |
| 17. Is line 5 divided by line 6 greater than 1.5? | _____ / _____ | _____ / _____ |

Signature _____

Typed name _____

Title _____

Date _____

RECEIVED

MAR 25 1985

ILPA-DLPC

Alternative II

1. Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the four paragraphs above) \$ 1,052,854
2. Current bond rating of most recent issuance of this firm and name of rating service Moody's A2 S & P A
3. Date of issuance of bond 6-15-1981
4. Date of maturity of bond 6-15-2006
- *5. Tangible net worth (if any portion of the closure and post-closure cost estimates is included in "total liabilities" on your firm's financial statements, you may add the amount of that portion to this line) \$ 1,116,000,000
- *6. Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.) \$ 2,002,000,000
- | | Yes | No |
|--|----------|----------|
| 7. Is line 5 at least \$10 million? | <u>X</u> | / |
| 8. Is line 5 at least 6 times line 1? | <u>X</u> | / |
| *9. Are at least 90% of firm's assets located in the U.S.? | | <u>X</u> |
| If not, complete line 10. | <u>X</u> | / |
| 10. Is line 6 at least 6 times line 1? | | / |

Signature

Typed name

Title

Date

Robert E. Byrket

Robert E. Byrket

Chief Financial Officer

1-23-85

Dana Corporation
Spicer Axle Division
Fort Wayne Plant
2100 West State Blvd.
P.O. Box 750
Fort Wayne, Indiana 46801
ID#-IND 005 470 885
Closure - \$11,025
Post-closure -\$0-

Dana Corporation
Boston Industrial Products
P.O. Box 500
Hohenwald, Tennessee 38462
ID#-IND 004 045 605
Closure - \$206,700
Post-closure - \$232,140

Dana Corporation
Tyrone Hydraulics
Corner of Fulton and Golding Drives
P.O. Box 511
Corinth, Mississippi 38834
ID#-MSD 007 020 043
Closure - \$11,024
Post-closure - \$16,536

Dana Corporation
Spicer Transmission Division
4929 Krueger Drive
Jonesboro, Arkansas
ID#-ARD 097 908 461
Closure - \$552
Post-closure - \$1,103

RECEIVED

MAR 25 1985

IEPA-DLPC

Dana Corporation
Weatherhead Division
203 Weatherhead Street
Angola, Indiana 46703
ID#-IND 005 480 942
Closure - \$295,910
Post-closure -\$0-

Dana Corporation
Weatherhead Division
West Ellsworth Street
P.O. Box 131
Columbia City, Indiana 46725
ID#-IND 000 804 781
Closure - \$44,096
Post-closure -\$0-

Dana Corporation
Weatherhead Division
U.S. Route 24
Antwerp, Ohio 45813
ID#-OHD 005 039 730
Closure - \$11,690
Post-closure - \$78,292

Dana Corporation
Spicer Transmission Division
4100 Bennett Road
P.O. Box 986
Toledo, Ohio 43696
ID#-OHD 052 813 540
Closure - \$64,000
Post-closure \$-0-

Dana Corporation
Lantex Hydraulic
600 West Beltline Road
P.O. Drawer 340
Lancaster, Texas 75146
ID#-TXD 007 365 729
Closure - \$5,986
Post-closure -\$0-

Dana Corporation
Perfect Circle Division
1900 Summit
P.O. Box 2027
Hastings, Nebraska 68901
ID#-NED 091 998 567
Closure - \$24,000
Post-closure -\$0-

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MAR 25 1985

IEPA-DLPC



1600 NATIONAL BANK BUILDING
606 MADISON AVENUE
TOLEDO, OHIO 43604
419 255-2760

March 18, 1985

Mr. Robert E. Byrket
Executive Vice President,
Chief Administrative Officer
and Chief Financial Officer
Dana Corporation
4500 Dorr Street
Toledo, Ohio 43615

RECEIVED

MAR 25 1985

IEPA-DLPC

Dear Mr. Byrket:

We have examined the consolidated balance sheet of Dana Corporation and its Consolidated Subsidiaries as of December 31, 1984 and the related consolidated statements of income, of shareholders' equity and of changes in financial position for the year then ended. Our examination was made in accordance with generally accepted auditing standards and accordingly included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances. Our report thereon appears on page 32 of Dana's Annual Report.

In connection with your letter to the Regional Administrator of the Environmental Protection Agency, we compared "Tangible net worth" of \$1,116 million (shareholders' equity of \$1,223 million less goodwill of \$107 million) indicated in item 5 and "Total assets in U.S." of \$2,002 million (which includes \$138 million investment in foreign affiliates and \$15 million intercompany accounts) in item 6 to the corresponding amounts in the audited financial statements or supporting schedules from which such amounts were derived and found such amounts to be in agreement.

Yours very truly,

Price Waterhouse

February 12, 1985



Illinois EPA
Div. of Land Pollution Control
Permit Section - Financial Assurance
2200 Churchill Rd.
Springfield, IL 62706

Re: NOTICE OF INTENTION NOT TO RENEW
Policy No. IE 100298
Coverage: Claims Made Environmental Impairment Liability
Expiration: May 1, 1985
Insurer: Evanston Insurance Company

Gentlemen:

Please take notice that the above certificate issued to you through the Evanston Insurance Company and which expires as indicated above will not be renewed by the Insurer. We have recently decided to withdraw from this market and this coverage is no longer available through us.

This letter is therefore our written notice of cancellation or termination of certificate and/or endorsement previously filed as to the following location or facility:

EPA Identification #: ILD068469368
ILD047074661

Location: Dana Corp.
5750 W. Roosevelt Rd.
Chicago, IL 60690

South Eaton Road
P.O. Box 599
Robinson, IL 62454

FEB 15 1985

Very truly yours,

Paul W. Springman/g

Paul W. Springman
Manager
Special Risks Department

PWS/sf

cc: Mr. John Anderson
MARSH & McLENNAN
One Woodland Avenue
Detroit, MI 48226



CORPORATE OFFICES

January 24, 1985

Rama K. Chaturvedi
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, IL 62706

Re: 0310510003 - Cook Co., Cicero/Victor Products
ILD 068469386 AND
0338080007 - Crawford Co., Robinson/Dana Corp.
ILD 047074661

Dear Sir:

Pursuant to your letter of December 21, 1984, please find enclosed an executed letter from Dana's Chief Financial Officer regarding the Company's closure/post closure cost estimates for 1983. Be advised that you will be receiving copies of the respective plant's closure/post closure plans under separate cover from the subject plants.

If you have any questions, please call me at (419) 535-4792.

Very truly yours,

Clement A. Revetti
Legal Counsel

CAR/mlc
cc: D. Owens (Robinson, IL)
R. Fraske (Cicero, IL)
Encl.

RECEIVED

JAN 31 1985

IEPA-DLPC

LETTER FROM CHIEF FINANCIAL OFFICER

(Assurance of closure and/or post-closure care)

Director
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Dear Sir or Madam:

I am the chief financial officer of Dana Corporation

(1)

This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265 and/or Subpart H of 35 Illinois Administrative Code Parts 724 and 725.

See Instruction (2)

- This firm is the owner or operator of the following facilities for which financial assurance for closure and/or post-closure care is demonstrated through the financial test specified in Subpart H of 35 Ill. Adm. Code Parts 724 and 725. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: (LIST ALL THE ILLINOIS FACILITIES USING THE FINANCIAL TEST)

USEPA I.D. No. <u>ILD 068 469 368</u> (3)	Closure Amount (4)	Post-Closure Amount (5)	Closure and Post-Closure Amounts (6)
Name <u>Dana Corporation-Victor Products Div.</u>			
Address <u>5750 West Roosevelt Rd.</u>	\$22,000	-0-	\$22,000
City <u>Chicago, IL 60690</u>			

USEPA I.D. No. <u>ILD 047 074 661</u>	Closure Amount	Post-Closure Amount	Closure and Post-Closure Amounts
Name <u>Dana Corporation-Victor Products Div.</u>			
Address <u>South Eaton Rd.</u>	\$1,060	\$10,600	\$11,660
City <u>Robinson, IL 62454</u>			

Please attach a separate page if more space is needed for all facilities.

- This firm guarantees, through the corporate guarantee specified in Subpart H of 35 Ill. Adm. Code Parts 724 and 725, the closure and/or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for closure and/or post closure care so guaranteed are shown for each facility: (LIST ALL THE ILLINOIS FACILITIES USING THE CORPORATE GUARANTEE)

USEPA I.D. No. <u>Not applicable.</u> (3)	Closure Amount (4)	Post-Closure Amount (5)	Closure and Post-Closure Amounts (6)
Name _____			
Address _____			
City _____			
USEPA I.D. No. _____			
Name _____			
Address _____			
City _____			

Please attach a separate page if more space is needed for all facilities.

RECEIVED

JAN 31 1985

This Agency is authorized to require this information under Illinois Revised Statutes, 1981, Chapter 111 1/2, Section 21(f). Disclosure of this information is required. Failure to do so may result in a civil penalty not to exceed \$25,000 per day of violation. Falsification of this information may constitute a Class 4 felony, which also carries a fine of up to \$25,000 per day of violation for the first offense. This form has been approved by the Forms Management Center.

care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: (LIST FACILITIES WHICH ARE NOT IN ILLINOIS BUT ARE SUBJECT TO A STATE OR FEDERAL FINANCIAL ASSURANCE REQUIREMENT THAT ARE ASSURED BY A FINANCIAL TEST OR CORPORATE GUARANTEE)

USEPA I.D. No. (3)	See Attached.	Closure Amount (4)	Post-Closure Amount (5)	Closure and Post-Closure Amount (6)
<u>Name</u>				
<u>Address</u>				
<u>City</u>				
<u>USEPA I.D. No.</u>				
<u>Name</u>				
<u>Address</u>				
<u>City</u>				

Please attach a separate page if more space is needed for all facilities.

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a post-closure care, is *NOT* demonstrated either to IEPA, USEPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent state mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: (LIST FACILITIES IN RESTRICTED AUTHORIZED STATES WHERE THERE IS NO STATE FINANCIAL ASSURANCE REQUIREMENT)

USEPA I.D. No. (3)	Not Applicable.	Closure Amount (4)	Post-Closure Amount (5)	Closure and Post-Closure Amount (6)
<u>Name</u>				
<u>Address</u>				
<u>City</u>				
<u>USEPA I.D. No.</u>				
<u>Name</u>				
<u>Address</u>				
<u>City</u>				

Please attach a separate page if more space is needed for all facilities.

This firm is required ⁽⁷⁾ to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31 ⁽⁸⁾ *. The figures for the following items marked with an asterisk are derived from the firm's independently audited, year-end financial statements for the latest completed fiscal year, ended 1983 ⁽⁹⁾.

Alternative I

1. Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the four paragraphs above)	\$
*2. Total liabilities (if any portion of the closure or post-closure cost estimates is included in total liabilities, you may deduct the amount of that portion from this line and add that amount to lines 3 and 4)	\$
*3. Tangible net worth	\$
*4. Net worth	\$
*5. Current assets	\$
*6. Current liabilities	\$
7. Net working capital (line 5 minus line 6)	\$
*8. The sum of net income plus depreciation, depletion, and amortization	\$
*9. Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.)	\$

	Yes	No
10. Is line 3 at least \$10 million?	_____ / _____	_____ / _____
11. Is line 3 at least 6 times line 1?	_____ / _____	_____ / _____
12. Is line 7 at least 6 times line 1?	_____ / _____	_____ / _____
*13. Are at least 90% of firm's assets located in the U.S.?	_____ / _____	_____ / _____
If not, complete line 14.		
14. Is line 9 at least 6 times line 1?	_____ / _____	_____ / _____
15. Is line 2 divided by line 4 less than 2.0?	_____ / _____	_____ / _____
16. Is line 8 divided by line 2 greater than 0.1?	_____ / _____	_____ / _____
17. Is line 5 divided by line 6 greater than 1.5?	_____ / _____	_____ / _____

Signature

Typed name

Title

Date

See Instruction (10) (Letter From Chief Financial Officer)

Alternative II

1. Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the four paragraphs above) \$ 1,126,348
2. Current bond rating of most recent issuance of this firm and name of rating service S&P A
3. Date of issuance of bond 6-15-81
4. Date of maturity of bond 6-15-2006
- *5. Tangible net worth (if any portion of the closure and post-closure cost estimates is included in "total liabilities" on your firm's financial statements, you may add the amount of that portion to this line) \$ 1,020,000,00
- *6. Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.) \$ 1,602,626,00
- | | Yes | No |
|--|----------|----------|
| 7. Is line 5 at least \$10 million? | <u>X</u> | / |
| 8. Is line 5 at least 6 times line 1? | <u>X</u> | / |
| *9. Are at least 90% of firm's assets located in the U.S.? | / | <u>X</u> |
| If not, complete line 10. | | |
| 10. Is line 6 at least 6 times line 1? | <u>X</u> | / |

Signature

Typed name

Title

Date

Robert E. ByrketChief Financial Officer1-23-85

Dana Corporation
Spicer Transmission Division
4100 Bennett Road
P.O. Box 986
Toledo, Ohio 43696
ID#-OHD 052 813 540
Closure - \$38,000
Post-closure -\$0-

Dana Corporation
Lantex Hydraulic Road
600 West Beltline Road
P.O. Drawer 340
Lancaster, Texas 75146
ID#-TXD 007 365 729
Closure - \$5,100
Post-closure -\$0-

Dana Corporation
Perfect Circle Division
1900 Summit
P.O. Box 2027
Hastings, Nebraska 68901
ID#-NED 091 998 567
Closure - \$22,000
Post-closure -\$0-

Dana Corporation
Spicer Axle Division
Fort Wayne Plant
2100 West State Blvd.
P.O. Box 750
Fort Wayne, Indiana 46801
ID#-IND 005 470 885
Closure - \$10,600
Post-closure -\$0-

Dana Corporation
Boston Industrial Products
P.O. Box 500
Hohenwald, Tennessee 38462
ID#-IND 004 045 605
Closure - \$198,750
Post-closure - \$156,350

Dana Corporation
Tyrone Hydraulics
Corner of Fulton and Golding Drives
P.O. Box 511
Corinth, Mississippi 38834
ID#-MSD 007 020 043
Closure - \$10,600
Post-closure - \$15,900

Dana Corporation
Weatherhead Division
203 Weatherhead Street
Angola, Indiana 46703
ID#-IND 005 480 942
Closure - \$133,878
Post-closure -\$0-

Dana Corporation
Spicer Clutch Division
Fifth and Brandon Streets
Auburn, Indiana 46706
ID#-IND 005-478-466
Closure - \$212,000
Post-closure - \$159,000

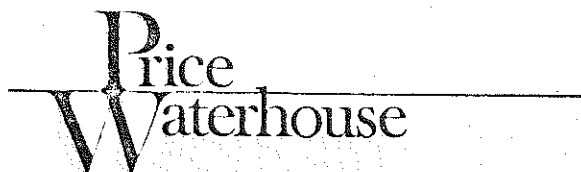
Dana Corporation
Weatherhead Division
West Ellsworth Street
P.O. Box 131
Columbia City, Indiana 46725
ID#-IND 000 804 781
Closure - \$42,400
Post-closure -\$0-

Dana Corporation
Weatherhead Division
U.S. Route 24
Antwerp, Ohio 45813
ID#-OHD 005 039 730
Closure - \$11,240
Post-closure - \$75,280

Dana Corporation
Spicer Transmission Division
4929 Krueger Drive
Jonesboro, Arkansas
ID#-ARD 097 908 461
Closure - \$530
Post-closure - \$1,060

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JAN 31 1985

IEPA-DLPC



1600 NATIONAL BANK BUILDING
606 MADISON AVENUE
TOLEDO, OHIO 43604
419 255-2760

March 28, 1984

Mr. Robert E. Byrket
Executive Vice President,
Chief Administrative Officer
and Chief Financial Officer
Dana Corporation
4500 Dorr Street
Toledo, Ohio 43615

Dear Mr. Byrket:

We have examined the consolidated balance sheet of Dana Corporation and its Consolidated Subsidiaries as of December 31, 1983 and the related consolidated statements of income, of shareholders' equity and of changes in financial position for the year then ended. Our examination was made in accordance with generally accepted auditing standards and accordingly included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances. Our report thereon appears on page F-14 of Dana's Annual Report.

In connection with your letter to the Regional Administrator of the Environmental Protection Agency, we compared "Tangible net worth" of \$1,020 million (shareholders' equity of \$1,118 million less goodwill of \$98 million) indicated in item 5 and "Total assets in U.S." of \$1,603 million (which includes \$559 million of "Corporate assets") in item 6 to the corresponding amounts in the audited financial statements from which such amounts were derived and found such amounts to be in agreement.

Yours very truly,

Price Waterhouse

RECEIVED

JAN 31 1985

IEPA-CLPC



217/782-6762

Log #FA082

12/26/84
red card
1/7/85

Refer to: 0310510003 -- Cook Co.
Cicero/Victor Products
ILD 068459386

December 21, 1984

Dana Corporation
Attention: Mr. Robert E. Byrket
Post Office Box 1000
Toledo, Ohio 43697

Dear Mr. Byrket:

The purpose of this letter is to address the status of your facility in relation to the Rules and Regulations of Title 35, Illinois Administrative Code, Part 725, Subpart H, Financial Requirements. The following apparent violations have been identified.

1. You failed to provide financial assurance as required by Subtitle G 725.243 (40 CFR 265.143). All owners or operator of each facility must establish financial assurance for closure of the facility.
2. Failed to submit your closure/post closure plan and cost estimates as requested under Subtitle G 725.174 (40 CFR 265.74). All records, including plans required under this part must be furnished upon request.
3. Failed to respond to our letter of March 3, 1984.

Your letter of May 9, 1984 attempts to respond to these apparent violations, however this response does not demonstrate compliance with the requirements set forth in the above regulations.

Please submit in writing, within fifteen (15) calendar days of the date of this letter the reasons for the apparent violations as well as a description of the steps you have instituted to correct the above cited violations.

Your written response should be directed to:

Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

Attention: Rama K. Chaturvedi, Manager
Permit Program Development Unit
Permit Section



Page 2

Further, please take notice that non-compliance with the Illinois Environmental Protection Act or the Rules and Regulations of the Illinois Pollution Control Board, may be the subject of Enforcement action pursuant to Title VIII of the Illinois Environmental Protection Act, Chapter III 1/2, III. Rev. Stat. Section 1001, et seq (1983).

If you have any questions or if we can be of assistance, please contact Andrew Vollmer or the undersigned at the above number.

Very truly yours,

A handwritten signature in cursive script, reading "Lawrence W. Eastep", followed by a smaller, less legible signature.

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:AV:rd24000/26-27

cc: Northern Regional Office
Compliance Monitoring Section
Gary King, Senior Attorney
Division File ✓



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

November 5, 1992

Ms. Mary McCoy
EPA and Safety Coordinator
Dana Corporation, Victor Products Division
5750 West Roosevelt Road
Chicago, IL 60650

Re: Visual Site Inspection
Dana Corporation
Victor Products Division
Chicago, Illinois
ILD 068 469 386

Dear Ms. McCoy:

As indicated in the letter of introduction sent to you on August 7, 1992, the U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

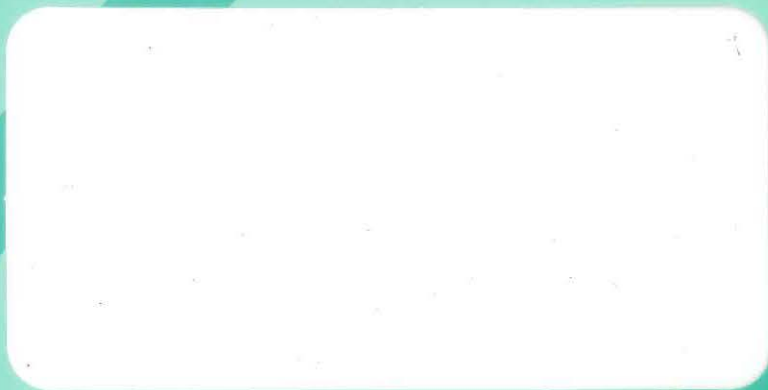
Sincerely yours,

A handwritten signature in dark ink, appearing to read "KMP", written over a horizontal line.

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch



U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006



TES 9

**Technical Enforcement Support
at Hazardous Waste Sites
Zone III
Regions 5,6, and 7**



PRC Environmental Management, Inc.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118



**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**DANA CORPORATION, VICTOR PRODUCTS
DIVISION
CHICAGO, ILLINOIS
ILD 068 469 386**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	ILD 068 469 386
Date Prepared	:	October 16, 1992
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087IL3L
Prepared by	:	Resource Applications, Inc. (Michael W. Gorman)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
EXECUTIVE SUMMARY	ES-1
1.0 INTRODUCTION	1
2.0 FACILITY DESCRIPTION	4
2.1 FACILITY LOCATION	4
2.2 FACILITY OPERATIONS	4
2.3 WASTE GENERATION AND MANAGEMENT	6
2.4 HISTORY OF DOCUMENTED RELEASES	12
2.5 REGULATORY HISTORY	13
2.6 ENVIRONMENTAL SETTING	14
2.6.1 Climate	15
2.6.2 Flood Plain and Surface Water	15
2.6.3 Geology and Soils	16
2.6.4 Ground Water	17
2.7 RECEPTORS	17
3.0 SOLID WASTE MANAGEMENT UNITS	19
4.0 AREAS OF CONCERN	26
5.0 CONCLUSIONS AND RECOMMENDATIONS	27
REFERENCES	32

Attachment

- A EPA PRELIMINARY ASSESSMENT FORM 2070-12
- B VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
- C VISUAL SITE INSPECTION FIELD NOTES

LIST OF TABLES

<u>Table</u>		<u>Page</u>
1	SOLID WASTE MANAGEMENT UNITS	7
2	SOLID WASTES	9
3	SWMU AND AOC SUMMARY	31

LIST OF FIGURES

<u>Figure</u>		<u>Page</u>
1	FACILITY LOCATION	5
2	FACILITY LAYOUT	8

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EXECUTIVE SUMMARY

ENFORCEMENT
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Resource Applications, Inc. (RAI), performed a preliminary assessment and visual site inspection (PA/VSII) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Dana Corporation, Victor Products Division (Dana) facility in Chicago, Illinois. This summary highlights the results of the PA/VSII and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

The Dana facility manufactures gaskets for industrial uses. Gaskets are manufactured by stamping tin plate, black plate, copper, stainless steel, and felt paper. After stamping, the gaskets are either coated with water-based or solvent-based coatings, or simply packed for shipping. In some instances, uncoated gaskets are cleaned in a sodium hydroxide solution. Facility operations generate waste solvents (liquids and solids) (F003), laboratory wastes (D001, D002), spent mineral spirits (D001), nonhazardous waste oil, nonhazardous water-based coating waste, nonhazardous water-based coating sludge, nonhazardous caustic wastewater, and nonhazardous oil-coated scrap metal. In the past, the facility generated spent trichloroethylene (TCE) bottoms from a vapor degreasing operation. Polychlorinated biphenyl (PCB)-contaminated oil and asbestos-coated pipes have also been removed from the facility. Between 1988 and 1991, 15 underground storage tanks (USTs) were removed and two were closed-in-place. During the removal of three of the USTs and the in-place-closure of two, 431 cubic yards of gasoline, diesel fuel, and fuel oil contaminated soil, were removed from the facility and landfilled. The areas where these five USTs were located have been remediated. Seven tanks were removed from the Menard Yard UST Farm (AOC 1) and 34 cubic yards of fuel oil-contaminated soil were removed. Dana is currently awaiting direction from the Illinois Environmental Protection Agency (IEPA) to determine if any further action is necessary. No contamination was detected in the areas where the remaining five USTs were removed.

The facility began operations in 1921 as Victor Products, Inc. In 1964, Dana Corporation purchased the facility and changed the name to Dana Corporation, Victor Products Division. Dana

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CONFIDENTIAL

employs 225 people, working two shifts, 5 days per week. Before 1921, the area was predominately industrial.

Dana submitted a RCRA Part A permit application to EPA on November 12, 1980 listing a 6,600-gallon capacity container storage area (S01). The S01 process code referred to the Drum Storage Area (SWMU 2). On December 12, 1985, Dana submitted a closure plan to IEPA, for the closure of SWMU 2. According to a January 8, 1987 letter from IEPA to the Dana facility, the closure of SWMU 2 met the requirements set forth in the closure plan and stated that the facility would regulated as a generator only.

The PA/VSI identified the following seven SWMUs and one AOC at the facility:

Solid Waste Management Units

1. Satellite Accumulation Areas
2. Drum Storage Area
3. Waste Oil Storage Area
4. Water-Based Coating Waste Tanks
5. Sodium Hydroxide Cleaning System
6. Scrap Metal Storage Area
7. Solid Waste Collection Areas

Area of Concern

1. Menard Yard UST Farm

Potential for release to ground water, surface water, air, or on-site soils is low from all SWMUs. All wastes are properly managed indoors, inside secured containers. After removal of the seven USTs in the Menard Yard UST Farm (AOC 1), xylene-contaminated soil at concentrations of 63.5 parts per million (ppm) was detected during soil analysis. The facility is currently conducting additional soil analysis to further characterize the extent of contamination. The excavated area created when the USTs were removed has been filled in with crushed stone and covered with visqueen. Because the depth to attainable ground water is over 1,000 feet, potential for release from AOC 1 to this medium is low. Because contaminants are contained in the soil, potential for release to surface water or air is low from AOC 1.

THURSDAY 1975
12/11/1975

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12/11/75

ENFORCEMENT
CONFIDENTIAL

The Dana facility is made up of two buildings, both 7 stories high with a combined area of 494,000 square-feet. The buildings are situated on a 4.8-acre parcel of land at 5250 West Roosevelt Road, Chicago, Illinois. Chicago has a population of about 3 million people. The facility is bordered on the north and east by industry, on the west by residences, and on the south by light commercial areas. The nearest school, Clark Grade School, is located about 200 feet northwest of the facility. The facility is surrounded by a 7-foot-high chain-link fence, has 24-hour security guards, and video monitoring.

The facility receives water from the City of Chicago, which receives water from Lake Michigan. The closest industrial ground water well is located in Cicero, Illinois, 0.5 mile southeast and downgradient of the facility, at a depth of approximately 1,600 feet. There are no residential wells within 2 miles of the facility. The closest surface water bodies are two lagoons at Columbus Park, 0.5 mile northeast of the facility. These lagoons measure approximately 4 acres and are classified as palustrine, open water wetlands.

RAI recommends conducting additional soil analysis at AOC 1, the Menard Yard UST Farm, in order to ensure that all contaminated soil has been removed. If necessary, the area should be remediated. RAI recommends no further action for the SWMUs at the Dana facility.

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THE
TREASURY
DEPARTMENT

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U.S. DEPT. OF THE TREASURY

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. Resource Applications, Inc. (RAI), TES 9 team member, provided the necessary assistance to complete the PA/VSI activities for the Dana Corporation, Victor Products Division (Dana) facility.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Dana facility (EPA Identification No. ILD 068 469 386) in Chicago, Illinois. The PA was completed on August 11, 1992. RAI gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA), U.S. Geological Survey (USGS), the U.S. Department of Commerce (USDC), the U.S. Department of the Interior (USDI), the National Oceanic and Atmospheric Administration (NOAA), and from EPA Region 5 RCRA files. The VSI was conducted on August 13, 1992. It included an interview with a Dana facility representative and a walk-through inspection of the facility. Seven SWMUs and one AOC were identified at the facility.

RAI completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and 11 inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

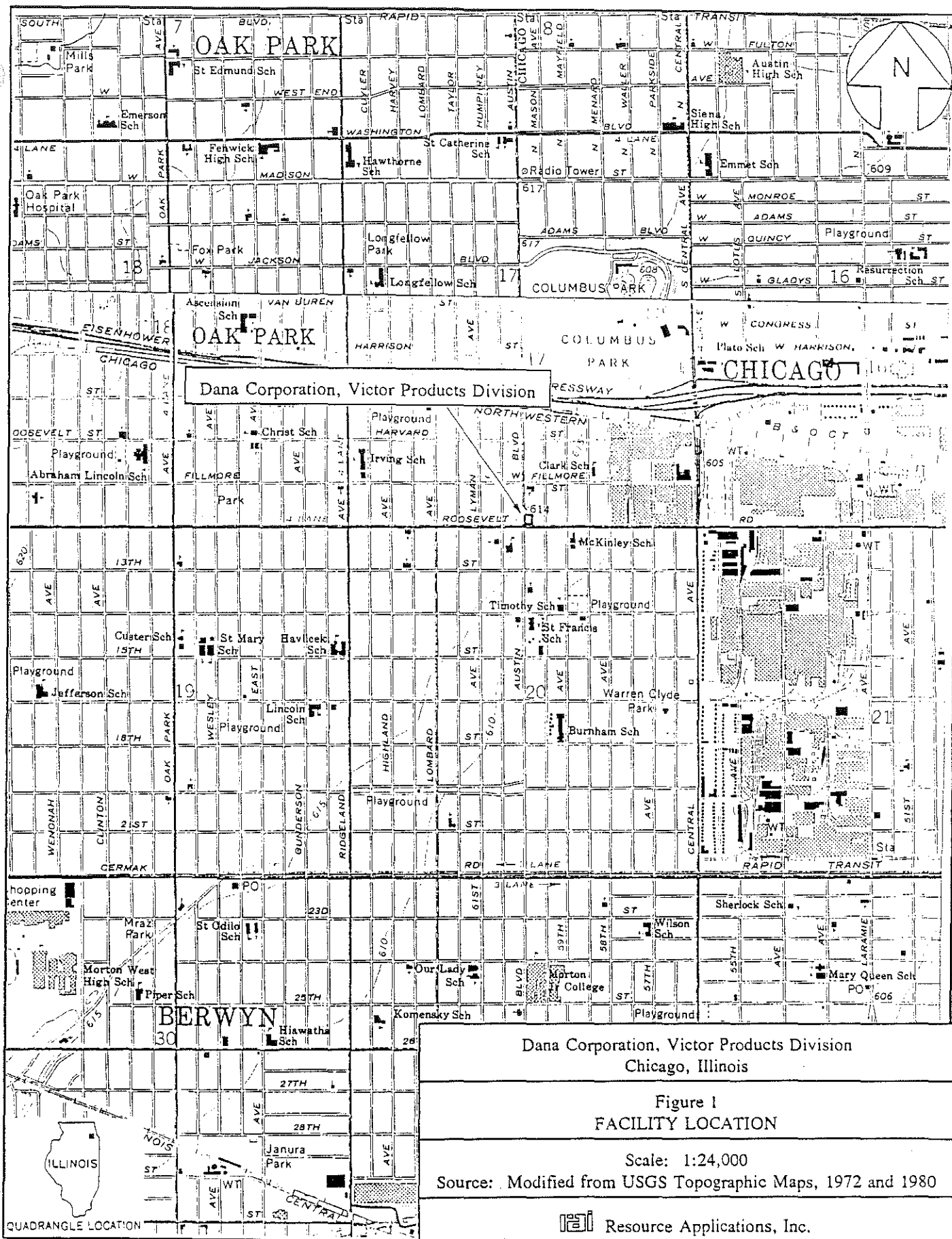
The Dana facility is located at 5750 West Roosevelt Road, in a mixed residential and industrial area of Chicago, Cook County, Illinois. Figure 1 shows the facility location in relationship to the surrounding topographic features (latitude 41°51'15" N and longitude 87°46'45" W). The Dana facility includes two 7-story buildings comprising 494,000 square feet of office, storage, and manufacturing space, on a 4.8-acre parcel of land. Only 380,000 square feet of building space is utilized.

The Dana facility is bordered on the west by residences, on the north and east by industry, and on the south by light commercial areas (i.e. small shops and restaurants).

2.2 FACILITY OPERATIONS

The facility began manufacturing gaskets in 1921 as Victor Products, Inc. In 1964, Dana Corporation purchased Victor Products, Inc., and changed the name to Dana Corporation, Victor Products Division. The facility currently employs 225 people, working 2 shifts, 5 days per week. Victor Products Division's headquarters is in Lisle, Illinois. Dana Corporation's headquarters is in Toledo, Ohio. Before operations began in 1921, the area where the Dana facility is now located was primarily industrial and residential.

The Dana facility manufactures gaskets by stamping and cutting tin plate, black plate, copper, stainless steel, and felt paper. Black plate is a different grade of tin plate. Black plate is placed between two sheets of felt paper to strengthen the gasket, before it proceeds to stamping. Stamping operations are conducted in Building 1. Once stamped, the gaskets are either coated and packed for shipping or just packed for shipping. The various types of coatings used at the Dana facility are



tested in a quality control (QC) laboratory. The coatings are primarily water-based, but some solvent-based coatings are also applied. Due to the proprietary nature of the coatings, the exact makeup was not available. Three methods of applying the coating are performed; silk screen coating, dip coating, or roller coating. Coating operations are conducted in Building 2. In some instances, before the coating is applied, gaskets are cleaned in a dip tank containing a sodium hydroxide solution. After coating, the gaskets are heat dried in an oven, after which, they are packed for shipping.

Two 30-gallon tanks and two 1-gallon tanks, all containing mineral spirits, are used for tool cleaning. A 450-gallon tank containing trichloroethylene (TCE) was previously used to degrease uncoated gaskets. The facility ceased using TCE as a degreaser in June 1991.

Currently all virgin material is stored indoors, inside 55-gallon drums. In the past, virgin material was managed in 17 underground storage tanks (USTs) and nine aboveground storage tanks (ASTs). Fifteen of the USTs have been removed and two have been closed-in-place. Three of the ASTs have been cleaned and removed, while the remaining six have been cleaned and closed-in-place. For a detailed discussion of the USTs, see Sections 2.4 and 2.5.

Hazardous and nonhazardous wastes generated at the facility and the SWMUs that manage the wastes are discussed in detail in Section 2.3.

2.3 WASTE GENERATION AND MANAGEMENT

During the production of gaskets, the Dana facility generates hazardous waste solvent and hazardous spent mineral spirits. The facility also generates nonhazardous waste oil, nonhazardous oil-coated scrap metal, and nonhazardous caustic wastewater. Rates of waste generation are based on 1991 reports. Facility SWMUs are identified in Table 1. The facility layout including the locations of SWMUs and AOCs is included as Figure 2. Table 2 summarizes the waste streams generated at the Dana facility.

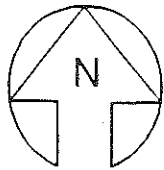
Waste solvents (F003) are generated from the three different coating operations. The wastes, consisting of both liquids and solids, are generated during the daily maintenance and cleaning of the

TABLE 1
SOLID WASTE MANAGEMENT UNITS

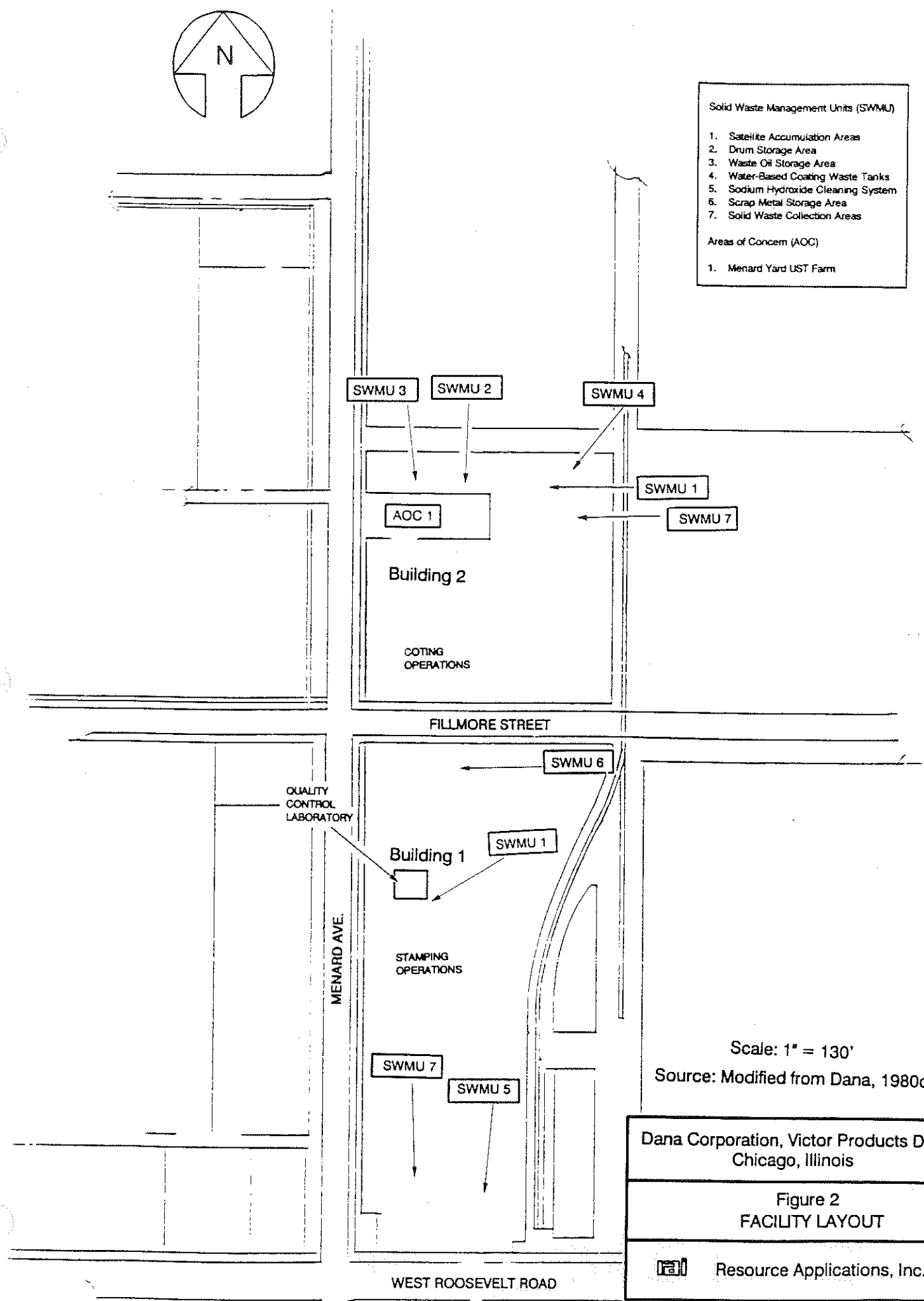
<u>SWMU Number</u>	<u>SWMU Name</u>	<u>RCRA Hazardous Waste Management Unit^a</u>	<u>Status</u>
1	Satellite Accumulation Areas	No	Active
2	Drum Storage Area	Yes	Active, RCRA closed in 1987. Currently manages hazardous waste for less than 90 days.
3	Waste Oil Storage Area	No	Active, manages nonhazardous waste.
4	Water-Based Coating Waste Tanks	No	Active, manages nonhazardous waste.
5	Sodium Hydroxide Cleaning System	No	Active, manages nonhazardous waste.
6	Scrap Metal Storage Area	No	Active, manages nonhazardous waste.
7	Solid Waste Collection Areas	No	Active, manages nonhazardous waste.

Note:

^a A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



- Solid Waste Management Units (SWMU)
1. Satellite Accumulation Areas
 2. Drum Storage Area
 3. Waste Oil Storage Area
 4. Water-Based Coating Waste Tanks
 5. Sodium Hydroxide Cleaning System
 6. Scrap Metal Storage Area
 7. Solid Waste Collection Areas
- Areas of Concern (AOC)
1. Menard Yard UST Farm



Scale: 1" = 130'
Source: Modified from Dana, 1980c


Dana Corporation, Victor Products Division Chicago, Illinois
Figure 2 FACILITY LAYOUT
 Resource Applications, Inc.

TABLE 2
SOLID WASTES

<u>Waste/EPA Waste Code^{a,b}</u>	<u>Source</u>	<u>Solid Waste Management Unit^c</u>
Waste Solvents/F003	Coating Operation	1 and 2
Laboratory Wastes/D001, D002	QC Laboratory	1 and 2
Spent Mineral Spirits/D001	Parts Washers	None
Waste Oil/NA	Production Machinery	3 and 7
Water-Based Coating Waste/NA	Coating Operation	4 and 7
Water-Based Coating Sludge/NA	SWMU 4	2 and 4
Caustic Wastewater/NA	Cleaning Tanks	5
Oil-Coated Scrap Metal/NA	Stamping Operations	6 and 7
Spent TCE Bottoms/F001 ^d	Degreasing Operations	2
Polychlorinated Biphenyl (PCB)-Contaminated Oil/ORM ^d	Maintenance	None
Asbestos/ORM ^d	Maintenance	None
Contaminated Soil/NA ^d	UST Remediation	None

Notes:

^a Not applicable (NA) designates nonhazardous waste.

^b "ORM" stands for other regulated material.

^c "None" indicates that the waste is not managed on site.

^d These wastes were either a one-time generation or are no longer generated.

coating machines. Waste solvents (liquid) are poured into 5-gallon buckets located at Satellite Accumulation Areas (SWMU 1). When full, the buckets are transferred to a Drum Storage Area (SWMU 2). Waste solvent (solids), made up of rags and gloves are also collected in a 5-gallon bucket at SWMU 1 prior to transfer to SWMU 2. Waste solvents (liquid) are generated at the rate of 440 gallons per year and are picked up by American Waste Processing (AWP), Maywood, Illinois, for fuel blending. Waste solvents (solid) are generated at the rate of 3,575 gallons per year and are picked up by AWP for incineration.

Occasionally laboratory wastes consisting of outdated material and off-specification products are generated from the QC laboratory located in Building 1. The Dana facility did not generate laboratory wastes during 1990. However, 674 gallons of laboratory wastes (D001, D002) were generated during 1991. Laboratory wastes are initially managed in glass and metal containers at SWMU 1 before transport to SWMU 2, where they are picked up and reclaimed by Treatment One, a division of SET Environmental, Houston, Texas (SET).

Spent mineral spirits (D001) is removed directly from four parts washers at a rate of 467 gallons per year. Spent mineral spirits is not managed on site. The spent mineral spirits are picked up by Safety-Kleen Corporation, Franklin Park, Illinois, and reclaimed.

Nonhazardous waste oil is generated from the cleaning and routine maintenance of production machinery. Waste oil is pumped from machinery into a 55-gallon steel drum, that is located in the Solid Waste Collection Areas (SWMU 7). The drum is transported throughout the facility by Dana personnel to collect the waste oil, and at any given time, can be located at one of several places throughout the facility. Waste oil is pumped from various pieces of machinery and from drip trays, also part of SWMU 7, located beneath machinery. When full, the drum is transferred to the Waste Oil Storage Area (SWMU 3). Generated at a rate of 2,310 gallons per year, waste oil is picked up by AWP for recycling.

Nonhazardous water-based coating waste is generated from coating operations. Residual coating drips from coating machines into a 5-gallon plastic bucket, which is located in one of the Solid Waste Collection Areas (SWMU 7). When the bucket becomes full, the waste is poured into the Water-Based Coating Waste Tanks (SWMU 4). SWMU 4 consists of two tanks, Tank 1 is

located directly above Tank 2, but on a separate floor. Wastes are poured into Tank 1 and gravity feed into Tank 2. Filters are located in both tanks to separate solids from the water-based coating waste. Once the solids are separated, the water-based coating waste is then routinely discharged under permit to the Chicago Metropolitan Water Reclamation District (CMWRD) sewer. Periodically, the solids are scraped from the filters of both tanks, generating a nonhazardous water-based coating sludge. The sludge is scraped into a 5-gallon plastic bucket and transported to the Drum Storage Area (SWMU 2), where it is mixed with waste solvents (F003). Approximately 10 gallons of nonhazardous water-based coating sludge are mixed with waste solvents (F003) on a monthly basis.

Nonhazardous caustic wastewater is generated from a Sodium Hydroxide Cleaning System (SWMU 5). The system consists of two tanks: one tank contains sodium hydroxide while the other is a water rinse tank. Sodium hydroxide is used to clean uncoated gaskets, and when the solution becomes too dirty to effectively clean, hydrochloric acid is added to the tanks to neutralize the solution. Facility personnel open a valve and the neutralized wastewater is discharged under permit to the CMWRD sewer. The facility discharges approximately 550 gallons per year of caustic wastewater to the CMWRD sewer.

Scrap metals coated with oil are generated from the stamping operations. Scrap metals are collected in steel dumpsters, part of Solid Waste Collection Areas (SWMU 7) and transferred to the Scrap Metal Storage Area (SWMU 6). The scrap metals are picked up by Kingsbury Scrap and Iron Company (Kingsbury), Chicago, Illinois at a rate of 74,000 pounds per month.

The Dana facility previously used (ceased in 1991) TCE to clean gaskets. Spent TCE bottoms (F001) were generated during the cleaning of the TCE vapor degreaser. The spent TCE bottoms were pumped into 55-gallon drums and transported to SWMU 2. Generated at a rate of 2,850 gallons per year, the waste was picked up by Baron-Blakeslee, Incorporated, (Baron-Blakeslee) Cicero, Illinois for fuel blending.

In March 1992, a single drum containing approximately 55 gallons of PCB-contaminated oil was picked up by SET, which transported the drum to Aptus Environmental Services, Coffeyville, Kansas for incineration.

In 1989, Burdco Environmental, Inc., removed 7 cubic yards of piping coated with asbestos from the Dana facility. The asbestos was sent to the CID Landfill, Calumet City, Illinois.

During the removal of USTs No. 6, 9, and 14b, and the in-place-closure of USTs No. 7 and 8, approximately 431 cubic yards of contaminated soil was removed. The nonhazardous contaminated soil was removed by American Waste Haulers, Incorporated (AWH), and transported to the CID Landfill, Calumet City, Illinois. Additional information is included in Section 2.4.

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the facility.

There is no actual documented date for a release; however, during the removal or closure of USTs at the Dana facility, contaminated soil has been encountered. On February 28, 1989, UST No. 6, which contained gasoline, was removed. A total of 102 yards of soil contaminated with gasoline were excavated and removed by AWH for disposal at the CID landfill. After the contaminated soil was removed and landfilled, analysis of remaining soil for total benzene, toluene, ethyl benzene, and xylene (BTEX), were less than 0.02 parts per million (ppm), well below IEPA cleanup objectives of 16.025 ppm for total BTEX (Dana, 1990b).

UST No. 9 contained diesel fuel and was removed on March 15, 1989. A total of 255 cubic yards of diesel fuel contaminated soil were removed by AWH for landfilling at CID. Soil analysis conducted in the excavated hole detected total BTEX at 1.03 ppm (Dana, 1990b).

On September 7, 1989, UST No. 14b, containing gasoline was removed and 29 cubic yards of contaminated soil were excavated. The contaminated soil was removed by AWH for disposal at the CID landfill. Soil analysis conducted in the excavated hole detected BTEX levels at 0.415 ppm (Dana, 1990a).

In 1991, USTs No. 7 and 8 were closed-in-place. Both USTs contained fuel oil. During closure, contaminated soil was encountered. Approximately 45 cubic yards of contaminated soil were

removed by AWH and transported to the CID Landfill. After the contaminated soil was excavated and removed, soil analysis was conducted in the excavated holes. Results for BTEX were less than 0.021 ppm, well below IEPA cleanup objectives for total BTEX (Dana, 1991).

Soil analysis conducted after USTs No. 19 through 25 were removed from the Menard Yard UST Farm (AOC 1), detected xylene at 63.5 ppm. Dana began remediation by removing 34 cubic yards of contaminated soil. The soil was removed by AWH for disposal at the CID landfill. The excavate area has been filled with crushed stone and covered with visqueen. No samples have been taken since the contaminated soil has been removed. The Dana facility is currently awaiting directive from IEPA to determine if further action is necessary (Dana, 1989).

During the VSI, RAI observed a clear liquid leaking from Tank 2 of the Water-Based Coating Waste Tanks (SWMU 4). The liquid had formed a pool underneath the tank measuring approximately 10 feet in diameter and 1 inch deep. By the end of the VSI, facility personnel had begun to repair the breach in the tank. The release appeared to have been contained inside the facility. Both tanks have since been replaced with newer tanks.

2.5 REGULATORY HISTORY

Dana submitted a Notification of Hazardous Waste Activity form to EPA on June 25, 1980 designating the company as a generator, storage and disposal facility (Dana, 1980a). The June notification listed F001, F003, and F005 waste codes as well as several four-digit numerical waste codes. Dana resubmitted a Notification of Hazardous Activity form on July 17, 1980 and replaced the four-digit numerical codes with "U" waste codes (Dana, 1980b). The numerical codes were typographical errors. On November 12, 1980, Dana submitted a RCRA Part A permit application listing a 6,600-gallon capacity container storage area (S01) and F001, F003, F005, and U171 waste codes (Dana, 1980c). The S01 process code referred to the Drum Storage Area (SWMU 2). Dana submitted a closure plan to IEPA on December 12, 1985 for the closure of SWMU 2 (Dana, 1985). The closure plan was approved by IEPA on February 13, 1986 (IEPA, 1986). A January 8, 1987 letter from IEPA to the Dana facility stated that closure of SWMU 2 met the requirements set forth in the approved closure plan and that the facility would be regulated as a generator only (IEPA, 1987a).

According to the letter, the determination was made during an October 1986 inspection. The facility is currently regulated as a large quantity generator.

The Dana facility has a history of RCRA compliance problems. On December 21, 1984, a Compliance Inquiry Letter (CIL) from IEPA was sent to the Dana facility concerning Dana's closure plan and proof of financial assurance (IEPA, 1984). As a result of the CIL, a Complaint, Findings of Violation, and Compliance Order was issued by EPA on June 13, 1986 (EPA, 1986). A Consent Agreement and Final Order was signed in March 1987, in which a \$3,500.00 penalty was levied against the Dana facility (EPA, 1987). A March 27, 1987 letter from IEPA confirmed that the violations noted in the December 1984 CIL were resolved (IEPA, 1987b). There are no other outstanding RCRA compliance issues at the Dana facility.

The Dana facility has a permit (No. 00034468 A) from CMWRD to discharge sanitary and industrial wastewater. There have been no reported violations of this permit.

The Dana facility does not have a National Pollutant Discharge Elimination System (NPDES) permit, nor is one required.

Dana has an IEPA permit (No. 73060149) to operate air pollution control equipment. No violations have been documented.

Beginning in 1988, Dana began decommissioning the 17 USTs located at the facility. As discussed in Section 2.4, contaminated soil was encountered and all areas, except the Menard Yard UST Farm (AOC 1), were remediated. The Dana facility is currently in the process of assessing the soil contamination at AOC 1.

There has been no CERCLA activity at the Dana facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the Dana facility.

2.6.1 Climate

The climate in Cook County is typically continental with cold winters, warm summers, and frequent short-period fluctuations in temperature, humidity, cloudiness, and wind direction (Ruffner, 1978). The average daily temperature is 49.0 degrees Fahrenheit (°F). The lowest average daily temperature is 21.1°F in January. The highest average daily temperature is 83.6°F in July (Ruffner, 1978).

The total annual precipitation for the county is 35.12 inches (NOAA, 1991). The net annual precipitation for the county is 5.62 inches (NOAA, 1991; USDC, 1968). The mean annual lake evaporation for the county is 29.50 inches (USDC, 1968). In winter, about one-half of the precipitation, or 10 percent of the annual total, falls as snow. During the fall, winter, and spring, the pattern of precipitation tends to be more uniform over both time and distance, whereas, in the summer, rainfall is often locally heavy and variable. The 1-year, 24-hour maximum rainfall recorded in the area is 6.24 inches (Ruffner, 1978).

The prevailing wind is from the west-southwest. Average wind speed is highest in March at 11.8 miles per hour from the west (Ruffner, 1978).

2.6.2 Flood Plain and Surface Water

The Dana facility is located outside the 500-year flood plain (RAI, 1992). The topography in the vicinity of the site exhibits low relief with a gentle slope to the southeast. The nearest bodies of water are two Chicago Park District lagoons in Columbus Park which are used for recreational purposes. Columbus Park is located 0.5 mile northeast of the facility. The Chicago Sanitary and Ship Canal is located approximately 3 miles to the south, and is used for industrial purposes. The Canal flows southwestward and enters the Des Plaines River north of Joliet where it continues to flow southwest through Illinois (USGS, 1980).

Natural drainage in the vicinity of the site has been altered by roadways and other features. Surface water runoff from the site flows into storm sewers, which are believed to be vented to the

Chicago Sanitary and Ship Canal or the Des Plaines River, via the CMWRD sewer. No permits are required for storm water runoff into the sewer system.

2.6.3 Geology and Soils

Site specific information was not available, so regional information is presented here. The Dana facility is situated on Lake Plain deposits from glacial Lake Chicago (presently Lake Michigan). The Lake Plain deposits are a member of the Wadsworth Till of the Wedron Formation of the Pleistocene Epoch. The Wadsworth Till was deposited during the Wisconsin glacial stage between approximately 12,500 and 22,000 years before present (BP) (Willman, 1971).

The region is generally characterized by areas of low relief, formed as deposits on the floor of the glacial lake. These deposits were flattened by wave action. A slightly elevated beach ridge of the former shoreline of Lake Chicago runs in a northeast-southwest direction and is located approximately 0.5 mile west of the site. The topography of the region gently slopes southeastward, away from the former shoreline and toward the present Chicago Sanitary and Ship Canal (USGS, 1980).

The Wadsworth Till is a gray till interbedded with sorted sediments and composed primarily of sheet-like deposits of silt and clay-sized particles separated by beds of waterlaid sand, gravel, or silt. The thickness of the unconsolidated deposits in the vicinity of the site is approximately 50 feet (Willman, 1971).

The unconsolidated sediments in the region unconformably overlie bedrock of Silurian age. The uppermost bedrock unit is anticipated to be dolomite or a dolomitic limestone of the Niagaran and Alexandrian Formation. The Silurian age formations were most typically formed as reef deposits built while Illinois lay under a shallow sea between 400 and 435 million years BP. The thickness of the Silurian age formation in the vicinity of the site is approximately 200 to 250 feet (Willman, 1971).

Underlying the Silurian bedrock units is the Maquoketa Shale Group deposited during the Ordovician period which is approximately 200 feet thick in the vicinity of the site. The Maquoketa

Shale Group is composed of several individual shale formations and a limestone formation deposited approximately 435 to 600 million years BP (Willman, 1971).

The older Ordovician and Cambrian bedrock units beneath the Maquoketa Shale Group are composed primarily of limestones and sandstones, and are typically in excess of 2,000 feet thick (Willman, 1971).

2.6.4 Ground Water

The till layer of the Wadsworth Till generally does not provide sufficient yields to be utilized as a drinking water source due to its low permeability. The localized interbedded sand, silt, and gravel deposits can yield moderate quantities of ground water. Recharge to the till and associated localized sand, silt, and gravel units typically occurs locally from precipitation (Bergstrom, et al., 1955).

The bedrock unit below the unconsolidated materials in the northern Illinois area is an important aquifer; however, ground water from this aquifer is not used as a drinking water source in the area of the site, due to the availability of water from Lake Michigan. Ground water in the Niagaran and Alexandrian aquifers is primarily obtained from joints, fissures, and solution cavities. These water-bearing openings are irregularly distributed both vertically and horizontally in the units (Bergstrom, et al., 1955).

Beneath the Maquoketa Shale Group (a low permeability unit underlying the Silurian limestones) are the high yielding Ordovician and Cambrian age, Galesville and Mt. Simon Sandstones, and the Eau Claire and Franconia Formations. These units are frequently used aquifers in the northeastern Illinois region (Bergstrom, et al., 1955).

2.7 RECEPTORS

The Dana facility occupies 4.8 acres in a residential and industrial area in Chicago, Illinois. Chicago has a population of about 3 million people. The Dana facility presently employs 225 people.

The Dana facility is bordered on the north and east by industry, on the west by residences, and on the south by small restaurants and stores. The nearest school, Clark Grade School, is located about 200 feet northeast of the facility. The facility has 24-hour security guards, video cameras, and is surrounded by a 7-foot high chain-link fence.

The nearest surface water bodies are two lagoons located in Columbus Park, 0.5 mile northeast of the facility. The lagoons are used for recreational purposes. The only other surface water body within 3 miles of the facility is the Des Plaines River, located approximately 2.75 miles west of the facility.

Ground water is used as an industrial water supply in the area, but not by the facility. The Dana facility utilizes Lake Michigan water for industrial and sanitary purposes. There are no drinking water wells within 2 miles of the facility. The closest ground water well, used for industrial purposes, is located 0.5 mile southeast at a depth of 1,600 feet (RAI, 1992).

Sensitive environments are not located on site. However, the two lagoons located at Columbus Park measure approximately 4 acres and are classified as palustrine, open water wetlands (USDI, 1973). There are no other sensitive environments within 2 miles of the facility.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the seven SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and RAI's observations. Figure 2 shows the SWMU locations.

SWMU 1

Satellite Accumulation Areas

Unit Description:	The Satellite Accumulation Areas are located indoors inside the QC laboratory in Building 1 and the coating room inside Building 2. The area inside Building 1 measures 16 feet by 40 feet, with a tile floor. The area inside Building 2 measures 30 feet by 44 feet, and has a 6-inch-thick concrete floor with a 0.5-inch-thick metal plate cover. The area in Building 1 manages waste generated from the QC laboratory, while the area in Building 2 manages waste generated from the cleanup of coating machines (see Photographs No. 1, 2, and 3).
Date of Startup:	This unit began operation in the mid-1970s.
Date of Closure:	This unit is currently active.
Wastes Managed:	This unit manages waste solvents (F003) and laboratory wastes (D001, D002). Wastes from this unit are transferred to the Drum Storage Area (SWMU 2).
Release Controls:	The wastes are managed indoors, inside steel and plastic containers.
History of Documented Releases:	No releases from this unit have been documented.

Observations: During the VSI, no cracks or leaks were observed in the containers or surrounding floor. No evidence of a release or floor drains were noted in the area.

SWMU 2 Drum Storage Area

Unit Description: The Drum Storage Area is located in Building 2, inside a 60-foot by 80-foot room that has brick walls and 6-inch-thick concrete flooring. The unit manages hazardous waste, generated from the QC laboratory and coating operations, inside 55-gallon steel drums (see Photograph No. 4).

Date of Startup: This unit began operation in the mid-1970s.

Date of Closure: The unit underwent RCRA closure as a greater than 90-day storage area in 1987 and currently operates as a less than 90-day storage area.

Wastes Managed: This unit manages waste solvents (F003), laboratory wastes (D001, D002), and nonhazardous water-based coating sludge. The unit previously managed spent TCE bottoms (F001). Waste solvents and water-based coating sludge are picked up by AWP for incineration. Laboratory wastes are reclaimed by SET. Spent TCE bottoms were picked up by Baron Blakeslee for fuel blending.

Release Controls: The wastes are stored inside 55-gallon steel drums on top of 6 inches of concrete. All entrances to the room have an 8-inch-high concrete barrier at the base.

History of Documented Releases: No releases from this unit have been documented.

Observations: During the VSI, no cracks or leaks were observed in the drums or surrounding floor. RAI observed 21 drums labeled with F003 waste codes, inside the unit. No floor drains were noted inside the room and no evidence of a release was detected.

SWMU 3

Waste Oil Storage Area

Unit Description: The Waste Oil Storage Area is located in Building 2 inside a 60-foot by 60-foot room which is immediately west of SWMU 2. The unit has a 6-inch-thick concrete floor and brick walls. The unit manages waste generated from the cleaning of production machinery (see Photograph No. 5).

Date of Startup: This unit began operation in the mid-1970s.

Date of Closure: This unit is currently active.

Wastes Managed: This unit manages nonhazardous waste oil which is picked up by AWP for recycling.

Release Controls: The wastes are stored inside 55-gallon steel drums on top of 6 inches of concrete. All entrances to the room have an 8-inch-high concrete barrier at the base.

History of Documented Releases: No releases from this unit have been documented.

Observations: During the VSI, no cracks or leaks were observed in the drums. RAI observed seven drums containing waste oil. No floor drains were noted in the area and no evidence of a release was noted.

SWMU 4**Water-Based Coating Waste Tanks**

Unit Description: The Water-Based Coating Waste Tanks consists of two tanks located on separate floors inside Building 2. The unit is used to collect water-based wastes from the coating operation. Tank 1 is a 150-gallon steel tank that is located directly above Tank 2, a 200-gallon steel tank. Both tanks are situated on top of 6 inches of concrete. Tank 1 is located in a large open area, approximately 30-feet north of the coating operations. Tank 2 is located in a 20-foot by 60-foot room (see Photograph No. 6).

Date of Startup: This unit began operation in the mid-1970s.

Date of Closure: This unit is currently active.

Wastes Managed: This unit manages nonhazardous water-based coating waste which is routinely discharged to the CMWRD sewer. Nonhazardous water-based coating sludge accumulates at the bottom of the unit and is periodically pumped into a 5-gallon plastic bucket. The bucket is transported to SWMU 2 and the sludge is emptied into a 55-gallon drum containing waste solvent (F003).

Release Controls: The unit is located on top of 6 inches of concrete. No secondary containment exists.

History of Documented Releases: There have been no documented releases to environmental media; however, a leak in the tank was observed during the VSI (see below).

Observations: During the VSI, RAI observed a clear liquid leaking from Tank 2, forming a pool approximately 10 feet in diameter and 1 inch deep. By the end of the VSI, maintenance personnel began repairing the

leak. Upon subsequent conversations with the facility representative, RAI discovered that both tanks were replaced with new ones on September 17, 1992.

SWMU 5

Sodium Hydroxide Cleaning System

Unit Description: The unit consists of two tanks used to clean uncoated gaskets. Tank 1 has a 100-gallon capacity, is constructed of steel, and is used as a water rinse. Tank 2 has a 175-gallon capacity, is constructed of steel, and contains sodium hydroxide cleaning solution. Both tanks are located indoors, on the south side of Building 1, in a 40-foot by 40-foot room. Both tanks are located on top of a 6-inch-thick concrete floor and a 2-inch-high catchment tray is located underneath Tank 2 (see Photograph No. 7).

Date of Startup: This unit began operation in 1980.

Date of Closure: The unit is currently active.

Wastes Managed: Sodium hydroxide is used to clean uncoated gaskets. When the solution becomes too dirty, hydrochloric acid is added for neutralization and the nonhazardous wastewater generated is discharged to the CMWRD sewer.

Release Controls: The unit is located indoors, on top of 6 inches of concrete. A drip tray is located beneath Tank 2.

History of Documented Releases: There have been no documented releases from this unit.

Observations: During the VSI, no cracks or leaks were observed in the tanks. No evidence of a release or floor drains were observed in the room.

SWMU 6**Scrap Metal Storage Area**

Unit Description: The Scrap Metal Storage Area is located indoors, inside Building 1. The unit contains several 36-cubic-foot steel dumpsters used to collect scrap metal generated from stamping operations. The room where the scrap metal is collected is a large, open area in which a 50-foot by 25-foot area is used to collect the wastes. The containers are located on top of 6 inches of concrete (see Photograph No. 8).

Date of Startup: This unit began operation in 1950.

Date of Closure: This unit is currently active.

Wastes Managed: This unit manages nonhazardous scrap metal coated with oil. The scrap metals are picked up and recycled by Kingsbury.

Release Controls: The unit is located indoors, on top of 6 inches of concrete. The scrap metal is collected inside steel containers.

History of Documented Releases: No releases from this unit have been documented.

Observations: During the VSI, no cracks were observed in the containers or surrounding floor. No evidence of a release was observed and no floor drains were noted.

SWMU 7**Solid Waste Collection Areas**

Unit Description: The Solid Waste Collection Areas consist of several locations throughout the facility containing a 55-gallon steel drum, a 5-gallon plastic bucket, metal trays, and steel dumpsters. The 55-gallon steel drum is transported between Buildings 1 and 2, to collect waste oil.

The trays and dumpsters are located in Building 1 and the bucket is located in Building 2. The bucket is used to collect water-based coating waste. The metal trays measure 5 feet wide by 6 feet long by 2 inches high and are located beneath stamping machines. The trays collect residual oil from the stamping machine. The dumpsters each have a capacity of 36 cubic feet and collect scrap metal coated with oil generated from stamping operations. All collection devices are located on top of 6 inches of concrete (see Photographs No. 9 and 10).

Date of Startup:	This unit began operation in 1950.
Date of Closure:	This unit is currently active.
Wastes Managed:	This unit manages nonhazardous water-based coating waste, nonhazardous waste oil, and nonhazardous oil-coated scrap metal. Water-based coating waste is poured into SWMU 4; waste oil is transported to SWMU 3; and oil-coated scrap metal is transported to SWMU 6.
Release Controls:	The unit is located indoors on top of 6 inches of concrete.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, no cracks or leaks were observed in the bucket, metal trays, or surrounding floor. No evidence of a release or floor drains were noted in the area.

4.0 AREAS OF CONCERN

RAI identified one AOC during the PA/VSI. This AOC is discussed below; its location is shown in Figure 2.

AOC 1

Menard Yard UST Farm

In 1988, Dana had seven USTs (No. 19 through 25) removed from the Menard Yard UST Farm (AOC 1). The USTs had been in the ground since 1951. After removal of the tanks, soil analysis detected xylene concentrations at 63.5 ppm. When the USTs were removed, 34 cubic yards of contaminated soil were removed and the excavated holes were filled in with crushed stone and covered with visqueen. No soil samples were taken after the removal of contaminated soil. Therefore, the Menard Yard UST Farm is an AOC because of possible contamination still present in the soil. Dana is currently awaiting direction from IEPA to determine if further action is necessary. All other USTs formerly in other areas of the facility have been removed and soil analysis has shown that no significant contamination is present (i.e. above IEPA cleanup objectives) (see Photograph No 11).

RELEASED
DATE _____
RIN # _____
INITIALS WJG

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CONCLUSIONS AND RECOMMENDATIONS

The PA/VSU identified seven SWMUs and one AOC at the Dana facility. Background information on the facility's location; operations; waste generation and management; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. The AOC is discussed in Section 4.0. Following are RAI's conclusions and recommendations for each SWMU and AOC. Table 3, at the end of this section, summarizes the SWMUs and AOC at the facility and the recommended further actions.

SWMU 1

Satellite Accumulation Areas

Conclusions:

The unit is used to accumulate waste solvents (F003) and laboratory wastes (D001, D002), prior to transfer to the Drum Storage Area (SWMU 2). Wastes are accumulated inside glass and metal containers, located indoors, and containers are sealed at all times, except when wastes are being added. Therefore, potential for release to ground water, surface water, air, or on-site soils is low.

Recommendations:

RAI recommends no further action for this unit.

SWMU 2

Drum Storage Area

Conclusions:

The Drum Storage Area is used as a less than 90-day storage area for waste solvents (F003), laboratory wastes (D001, D002), and nonhazardous water-based coating sludge. The unit receives wastes initially managed in SWMU 1 and accumulated at the bottom of SWMU 4. All wastes are managed indoors, inside closed 55-gallon steel drums located on top of 6 inches of concrete. Therefore, potential for release to ground water, surface water, air, or on-site soils is low.

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AND BUSINESS

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Recommendations:

RAI recommends no further action for this unit.

SWMU 3

Waste Oil Storage Area

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DATE 12/1/92
RIN #
INITIALS CLK

Conclusions:

The Waste Oil Storage Area is used to store nonhazardous waste oil generated from production machinery. The unit manages wastes initially collected in the Solid Waste Collection Areas (SWMU 7). The waste oil is managed indoors, inside closed 55-gallon steel drums, located on top of 6 inches of concrete. Therefore, potential for release to ground water, surface water, air, or on-site soils is low.

Recommendations:

RAI recommends no further action for this unit.

SWMU 4

Water-Based Coating Waste Tanks

Conclusions:

The Water-Based Coating Waste Tanks store nonhazardous water-based coating waste, generated from the cleanup of coating machines. The unit is periodically cleaned out, and the nonhazardous water-based coating sludge that is accumulated in the bottom of Tanks 1 and 2 is scraped out and transferred to SWMU 2. The nonhazardous wastewater is discharged to the CMWRD sewer. During the VSI, RAI observed a clear liquid, leaking from Tank 2. The liquid had pooled beneath the tank in an area measuring approximately 10 feet in diameter and 1 inch deep. The liquid did not appear to have breached the wall or floor of the building. Facility personnel began sealing the leak during the VSI. It was later decided by facility personnel to replace both tanks, which was completed on September 17, 1992. Because the unit is located indoors, on top of 6 inches of concrete, potential for release to ground water, surface water, air, or on-site soils is low.

Recommendations:

RAI recommends no further action for this unit.

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SWMU 5

Sodium Hydroxide Cleaning System

Conclusions:

The unit uses sodium hydroxide to clean uncoated gaskets. When the caustic solution becomes contaminated, hydrochloric acid is added, and the neutralized solution is discharged to the CMWRD sewer. The unit is located indoors, on top of 6 inches of concrete. Therefore, potential for release to ground water, surface water, air, or on-site soils is low.

Recommendations:

RAI recommends no further action for this unit.

SWMU 6

Scrap Metal Storage Area

Conclusions:

The unit is used to collect oil-coated scrap metal, generated from stamping operations. The waste is initially managed in Solid Waste Collection Areas (SWMU 7), before transfer to the unit. The waste is managed indoors, inside steel dumpsters, located on top of 6 inches of concrete. Therefore, potential for release to ground water, surface water, air, or on-site soils is low.

Recommendations:

RAI recommends no further action for this unit.

SWMU 7

Solid Waste Collection Areas

Conclusions:

The unit collects nonhazardous waste oil, nonhazardous oil-coated scrap metal, and nonhazardous water-based coating waste from points of generation. The nonhazardous wastes are managed indoors, inside steel or plastic containers located on top of 6 inches of concrete. Therefore, potential for release to ground water, surface water, air, or on-site soils is low.

Recommendations:

RAI recommends no further action for this unit.

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EMERGENCY

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AOC 1

Menard Yard UST Farm

Conclusions:

In 1988, seven USTs were removed from the Menard Yard UST Farm. Soil analysis conducted after the tanks were removed detected xylene at 63.5 ppm. Thirty-four cubic yards of contaminated soil was removed; however, no soil analysis has been conducted since the contaminated soil was removed. The Dana facility is awaiting direction from IEPA on whether further action is necessary. Because obtainable ground water is located at a depth of approximately 1,000 feet, potential for release to this medium is low. Because contaminants are contained in the soil, potential for release to surface water or air is low.

Recommendations:

RAI recommends conducting additional soil analysis to ensure that all contaminated soil has been removed. If contamination is still present, the area should be remediated.

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DATE 12/10/80
RIN # 144
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TABLE 3
SWMU AND AOC SUMMARY

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Satellite Accumulation Areas	Mid-1970s to Present	None	RAI recommends no further action.
2. Drum Storage Area	Mid-1970s to Present	None	RAI recommends no further action.
3. Waste Oil Storage Area	Mid-1970s to Present	None	RAI recommends no further action.
4. Water-Based Coating Waste Tanks	Mid-1970s to Present	During VSI, clear liquid was observed leaking from the unit. The tanks have since been replaced.	RAI recommends no further action.
5. Sodium Hydroxide Cleaning System	1980 to Present	None	RAI recommends no further action.
6. Scrap Metal Storage Area	1950 to Present	None	RAI recommends no further action.
7. Solid Waste Collection Areas	1950 to Present	None	RAI recommends no further action.
<u>AOC</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Menard Yard UST Farm	1951 to 1988	Xylene contaminated soil was detected after removal of USTs.	Conduct additional soil analysis to further characterize extent of contamination; if necessary, remediate area.

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OF THE DIRECTOR

REFERENCES

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ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12

**EPA**

POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE IL	02 SITE NUMBER ILD 068 469 386
----------------	-----------------------------------

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Dana Corporation, Victor Products Division		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 5750 West Roosevelt Road			
03 CITY Chicago	04 STATE IL	05 ZIP CODE 60650	06 COUNTY Cook	07 COUNTY CODE	08 CONG DIST
09 COORDINATES: LATITUDE 41° 51' 15" N		LONGITUDE 87° 46' 45" W			
10 DIRECTIONS TO SITE (Starting from nearest public road) Interstate 290 west to Central Avenue. South on Central Avenue to Roosevelt. East on Roosevelt to the facility.					

III. RESPONSIBLE PARTIES

01 OWNER (if known) Dana Corporation		02 STREET (Business, mailing, residential) 4500 Dorr Street			
03 CITY Toledo	04 STATE OH	05 ZIP CODE 43615	06 TELEPHONE NUMBER (419) 535-4500		
07 OPERATOR (if known and different from owner) Dana Corporation, Victor Products Division		08 STREET (Business, mailing, residential) 5750 West Roosevelt Road			
09 CITY Chicago	10 STATE IL	11 ZIP CODE 60650	12 TELEPHONE NUMBER (312) 287-6180		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER _____ (Specify) <input type="checkbox"/> G. UNKNOWN					
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input checked="" type="checkbox"/> A. RCRA 3010 DATE RECEIVED: <u>07 / 18 / 80</u> <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ____ / ____ / ____ MONTH DAY YEAR MONTH DAY YEAR <input type="checkbox"/> C. NONE					

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE <u>08 / 13 / 92</u> <input type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input checked="" type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): <u>Resource Applications, Inc.</u>													
02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION <table border="0"><tr><td><u>1921</u></td><td> </td><td><u>Present</u></td><td></td><td><input type="checkbox"/> UNKNOWN</td></tr><tr><td>BEGINNING YEAR</td><td></td><td>ENDING YEAR</td><td></td><td></td></tr></table>				<u>1921</u>		<u>Present</u>		<input type="checkbox"/> UNKNOWN	BEGINNING YEAR		ENDING YEAR		
<u>1921</u>		<u>Present</u>		<input type="checkbox"/> UNKNOWN											
BEGINNING YEAR		ENDING YEAR													
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED Solvents, mineral spirits, trichloroethylene, sodium hydroxide, hydrochloric acid, and fuel oil.															
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION During removal of seven underground storage tanks in AOC 1, TCE-contaminated soil was detected. The facility is in the process of further evaluating the area.															

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.) <input type="checkbox"/> A. HIGH (Inspection required promptly) <input type="checkbox"/> B. MEDIUM (Inspection required) <input checked="" type="checkbox"/> C. LOW (Inspect on time-available basis) <input type="checkbox"/> D. NONE (No further action needed; complete current disposition form)			
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VI. INFORMATION AVAILABLE FROM

01 CONTACT Kevin Pierard	02 OF (Agency/Organization) EPA Region V		03 TELEPHONE NUMBER (312) 886-4448	
04 PERSON RESPONSIBLE FOR ASSESSMENT Michael W. Gorman	05 AGENCY	06 ORGANIZATION Resource Applications, Inc.	07 TELEPHONE NUMBER (312) 332-2230	08 DATE <u>9 / 21 / 92</u> MONTH DAY YEAR

ATTACHMENT B
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Dana Corporation, Victor Products Division
5750 West Roosevelt Road
Chicago, Illinois
ILD 068 469 386

Date: August 13, 1992

Primary Facility Representative: Mary McCoy, Dana Corporation, Victor Products Division,
EPA and Safety Coordinator

Representative Telephone No.: (312) 854-3921

Inspection Team: Michael W. Gorman, Resource Applications, Inc. (RAI)
William Earle, RAI

Photographer: William Earle

Weather Conditions: Overcast, cool, temperature about 65°F

Summary of Activities: The visual site inspection (VSI) began at 8:30 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Mary McCoy, facility representative, then discussed the facility's past and current operations, solid wastes generated, and release history. The facility representative provided the inspection team with copies of requested documents.

The VSI tour began at 12:30 p.m. and included an observation of facility operations and waste management practices. The following seven SWMUs were observed and identified at the Dana facility: Satellite Accumulation Areas (SWMU 1), Drum Storage Area (SWMU 2), Waste Oil Storage Area (SWMU 3), Water-Based Coating Waste Tanks (SWMU 4), Sodium Hydroxide Cleaning System (SWMU 5), Scrap Metal Storage Area (SWMU 6), and Solid Waste Collection Areas (SWMU 7). The Menard Yard UST Farm was identified during the VSI as an AOC.

The tour concluded at 2:30 p.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 4:00 p.m.



Photograph No. 1.

Orientation: North

Description: Container used to accumulate waste solvent (solid).

Location: SWMU 1

Date: 8/13/92



Photograph No. 2.

Orientation: South

Description: Container used to accumulate waste solvent (liquid).

Location: SWMU 1

Date: 8/13/92



Photograph No. 3.
 Orientation: West
 Description: Container used to accumulate laboratory wastes.

Location: SWMU 1
 Date: 8/13/92



Photograph No. 4.
 Orientation: South
 Description: The Drum Storage Area; all drums are waste solvents (F003).

Location: SWMU 2
 Date: 8/13/92



Photograph No. 5.

Orientation: West

Description: The Waste Oil Storage Area; drums in background are virgin oil.

Location: SWMU 3

Date: 8/13/92



Photograph No. 6.

Orientation: East

Description: Tank 2 of the Water-Based Coating Waste Tanks.

Location: SWMU 4

Date: 8/13/92



Photograph No. 7.

Orientation: East

Location: SWMU 5

Date: 8/13/92

Description: The Sodium Hydroxide Cleaning System. Tank on left contains a water rinse and tank on right contains sodium hydroxide.



Photograph No. 8.

Orientation: West

Location: SWMU 6

Date: 8/13/92

Description: The Scrap Metal Storage Area.



Photograph No. 9.

Orientation: North

Location: SWMU 7

Date: 8/13/92

Description: A drip tray, located in one of the Solid Waste Collection Areas. This drip tray is located beneath a stamping machine.



Photograph No. 10.

Orientation: North

Location: SWMU 7

Date: 8/13/92

Description: A bucket, located in one of the Solid Waste Collection Areas. This bucket is used to collect water-based coating waste.



Photograph No. 11.
Orientation: Northwest
Description: The Menard Yard UST Farm.

Location: AOC 1
Date: 8/13/92

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

8:30

Dana Corp. Victor Products Div.

8-13-92 Overcast Cool 65°

Mike Gorman RAI

William Earle RAI

Mary McCoy Dana Corp.

Dana Corp. Victor Products Division

Operations began in 1921

In 1921 family owned Victor
Products1964 Dana Corp purchased the Company
Since 1964, Name has been Dana Corp.

Victor Products Division

Dana Corps. headquarters are in Toledo, Ohio

Victor Products Division headquarters are in

Lisle, IL

size

West - Residential

East - Vacant

South - Residential

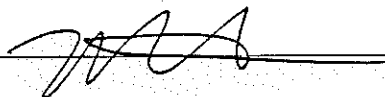
North - Vacant

Facility is

employs 225 2 shifts, 5 days/wk

24 HR security guards, video cameras

Perimeter Fencing



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Closest School - west of facility on
Menard "Clark Grade School"

Operations -

Mfgs. ~~large~~ gaskets for industrial
users i.e. (Tractors, machines)

Raw materials

Tin plate, black plate, Cu, stainless
steel, cold rolled steel, ^{Thomas}bestos
paper (feltins paper)

Company
Corp.

Paper is top + bottom, center is
usually black plate "different grade of tin plate".
Once formed, the material formed, it is
stamped, Cu, tin, & steel goes
directly to stamping

next
stage

Internal - Coating - silk screen

Dip coating

rolled coating

} Victor
Formulas
Coatings

Solvent or H_2O based coatings - primarily
water based, goal is to go entirely
to H_2O based

Mineral Spirits ^{xylene} ect.

Coating is conducted in one area
of facility

MA

90% Majority of Haz waste generated from Coating

After coating, products go through ovens for drying, then sometimes, reforming

Stamped	or	Coated
Coated		Stamped
Oven		Oven

Wastes generated from Coating
from daily cleanup

Silk Screen - is cleaned up more often

Dip - 2 times per day

Roller - "

Wastes - liquid - poured into 5 gal. bucket
- solid. rags & containers - put in

Plastic lined 5 gal containers
transferred to laboratory where
wastes are transferred into 55
gal drums. Manifested as
F003 for all coating waste codes



1.

2.

3.

since 1988

Mineral Spirits Used For parts cleaning,
tools, ect. self contained Tank
waste removed from process by Safety-Kleen
2 large - 30 gal
2 small - 5 gal maximum maybe
1 gal
generated 110 gal/quarter

nonhazardous - Oil & H_2O slurry, clean
out, drip pans, leaks
pumped into 55 gal drums &
transferred to laboratory

Scrap metal - ^{separated} from stamping operations
collected in steel condolas at press
taken to Compactor. placed in
dumpster & sold, cutting oils
"Oil & H_2O " slurry coats metal
scrap.

Caustic wastewater - From molding dept
2 tanks bath & rinse use
 $NaOH$ - chemical "acid" added
to neutralize &
dumped down drain

2 labs ^{Commercial} Laboratory - store products, Haz & non haz waste, & mix products

QC lab - Test Formulas, gaskets, ovens
Wastes are collected & transported to Commercial lab

Mixing in Commercial lab is from coating
If wastes are generated, they are stored & manifested

Past streams - TCE parts degreasing
stopped 6/91

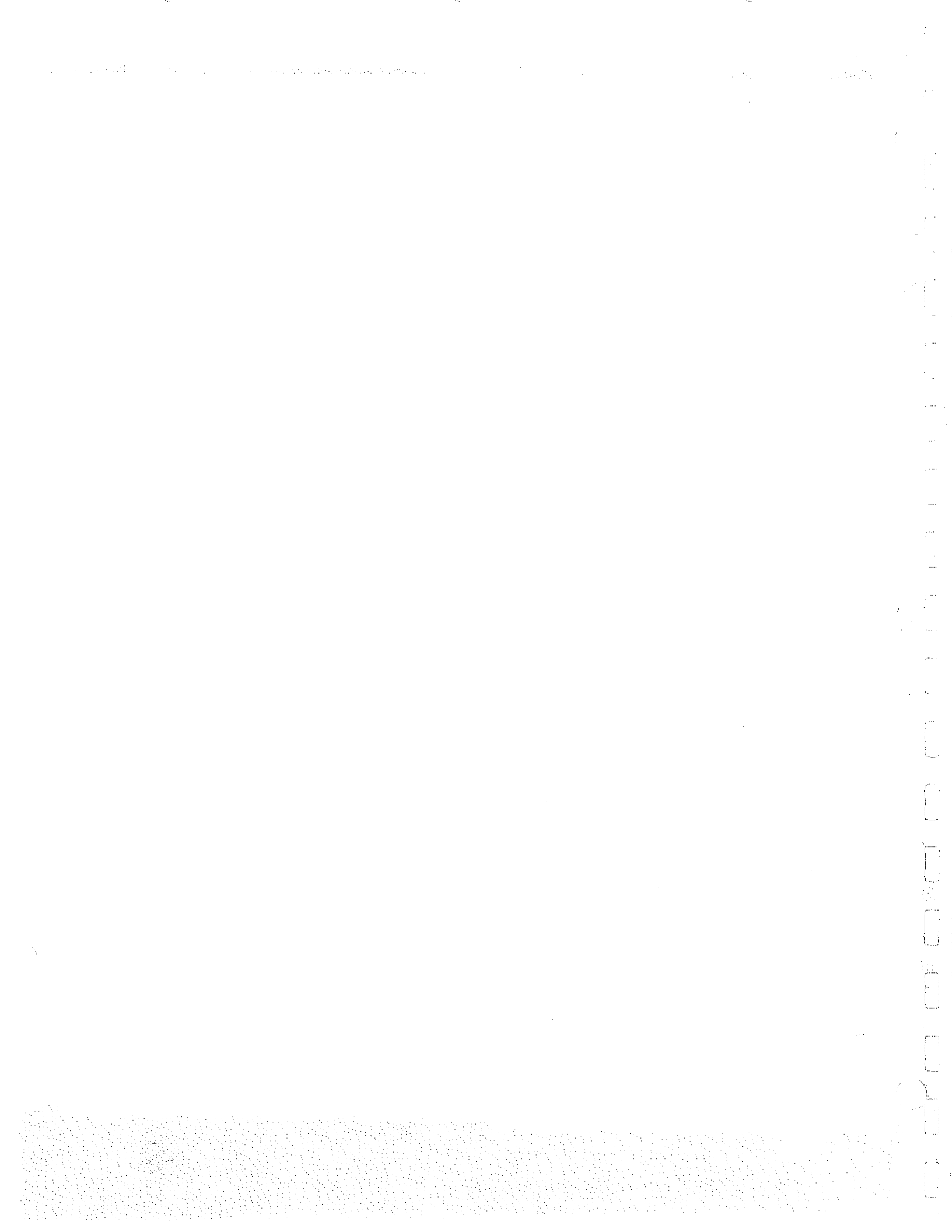
degreasing in process products
waste gen from cleanout of
Tank, wastes were drummed &
transported to Commercial lab
450 gal tank

Asbestos - was used in paper gaskets
began switch in 1983 & in 1987
switch was complete

* Get reports

PCB - one drum generated in 11/90

Att



Fires - July - 92 Bld 1 electrical, no
damage other than H_2O

- 1990 fire in chimney result from
spark by welding

No documented spills or releases

Total of 25 ASTs & USTs

Copies of reports will be made
available

Permits - sanitary permit for City of Chicago

Spray booth - for maintenance painting

Cans or guns, over spray exits
via vent get into via walk
through

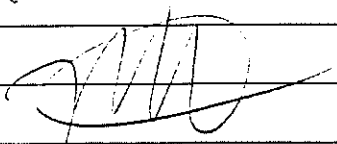


Photo log

- 1) W - Spray booth 6' x 10' - overspray
- 2) discharged to atmosphere
- 3) N H₂O based coolant, discharged to sewer
- 4) N Container for solid waste solvent
21 gal capacity 4 containers
44' x 30' room, concrete floor, with metal top, no floor drains
room was built in 1986
- 5) S 5 gal bucket of liquid waste
- 6) E settling tank collects particles from H₂O based coating waste
18" x 4' x 2' steel
concrete floor, H₂O observed leaking
- 7) W - Raw material storage & H.W. storage
21 drums of F003, shipment date 8/25/92
- 8) AS " " " "
60' x 80' concrete floor & walls
No drains
- 9) AS Haz waste solid compactor
- 10) W - Non haz oil & H₂O slurry
60' x 60'
7 drums of non haz
- 11) NW - Menard Yard USTs 19-25
- 12) SE - Tanks H₂O

13) W QC Lab S.A.A.

Tile floor 16' x 10' room

14) N Drip Tray for Oil collection 2' x 5' x 6'

15) E Caustic wash

Left Tank 18" x 3' x 3'

Rinse

RC. Tank 2' x 4' x 4'

} Steel
wash

on Concrete floor

Discharged to sewer

16) N USTs 6, 7, & 8

in foreground

17) E UST #9

18) N USTs 10-13

19) W Scrap metal gondolas 3' x 3' x 4'

20) E Shoot area for disposal

parking

storage

S

[Handwritten signature]



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

**77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590**

REPLY TO THE ATTENTION OF:

HRE-8J

August 7, 1992

**Ms. Mary McCoy, EPA and Safety Coordinator
Dana Corporation, Victor Products Division
5750 West Roosevelt Road
Chicago, Illinois 60650**

**Re: Visual Site Inspection
Dana Corporation, Victor Products
Division
ILD 068 469 386**

Dear Ms. McCoy:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

August 7, 1992

Page 2

The VSI has been scheduled for August 13, 1992, at 8:30 a.m. The inspection team will consist of Michael W. Gorman and William T. Earle of Resource Applications, Inc., a contractor for the U.S. EPA. Representatives of the Illinois Environmental Protection Agency (IEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with the present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI. Attachment II is a summary of the information required.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,



Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

enclosure

cc: Larry Eastep, Manager, Division of Land Pollution Control, IEPA-Springfield
Chuck Gruntman, Supervisor, Division of Land Pollution Control, IEPA-Maywood



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ATTACHMENT I

Dana Corporation, Victor Products Division
5750 West Roosevelt Road
Chicago, Illinois 60650

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

ATTACHMENT II

PROBABLE SOLID WASTE MANAGEMENT UNITS (SWMUs)

1. Little information was available to compile a list of solid waste management units (SWMUs) at your facility. Please list all waste management units at your facility. If possible, please provide as complete information for the waste unit in response to the questions below.

From the list of probable SWMUs please address the following questions:

- Do the above SWMUs still exist at the facility and are they in operation?
 - What are the start-up and closure dates of the above SWMUs?
 - What types of wastes are the SWMUs currently/formerly used for?
 - Name any SWMUs at your facility that have not been listed above. These would include hazardous waste storage areas, treatment units, or any other area or system at your facility dealing with hazardous waste including satellite accumulation areas.
 - What are the average volumes and rates of generation of waste streams?
 - Document any releases that have occurred at the facility. This includes spills or leaks of both wastes and raw product. Outline the action taken to clean up the release.
2. Please supply as much information as possible concerning the site history. This would include any information you have regarding past operations and any former owners/operators at this location.
 3. Please provide a description of the primary processes taking place at your facility and the waste streams which are generated.
 4. Describe the methods of treatment and disposal of generated waste utilized by your facility.

If available, the following items are requested:

- A detailed map of the facility showing current and former locations of SWMUs and production stations.
- Flow diagrams showing waste streams and waste management practices.
- Copies of any permits currently held by the facility.
- SARA Title III information and a copy of the facility contingency plan.

ILD 668 496 382 4

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: DANA CORP. VICTOR PRODUCTS DIV.

EPA I.D. NUMBER: IL. DO 68469386

LOCATION CITY: 5750 W. ROOSEVELT ROAD, CHICAGO

STATE: ILLINOIS 60650

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
• Landfill	_____	X
• Surface Impoundment	_____	X
• Land Farm	_____	X
• Waste Pile	_____	X
• Incinerator	_____	X
• Storage Tank (Above Ground)	_____	X
• Storage Tank (Underground)	_____	X
• Container Storage Area	_____	X
• Injection Wells	_____	X
• Wastewater Treatment Units	_____	X
• Transfer Stations	_____	X
• Waste Recycling Operations	_____	X
• Waste Treatment, Detoxification	_____	X
• Other _____	_____	_____

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

Richard J. Friske, Chief Facilities Engineer

Typed Name and Title

Richard J. Friske
Signature

2-4-86

Date

1. The first part of the report deals with the general situation of the country and the results of the survey. It is divided into two main sections: the first section deals with the general situation of the country and the second section deals with the results of the survey.

2. The second part of the report deals with the results of the survey. It is divided into three main sections: the first section deals with the results of the survey in the field of agriculture, the second section deals with the results of the survey in the field of industry, and the third section deals with the results of the survey in the field of commerce.

3. The third part of the report deals with the results of the survey in the field of commerce. It is divided into two main sections: the first section deals with the results of the survey in the field of foreign trade, and the second section deals with the results of the survey in the field of domestic trade.

4. The fourth part of the report deals with the results of the survey in the field of domestic trade. It is divided into two main sections: the first section deals with the results of the survey in the field of retail trade, and the second section deals with the results of the survey in the field of wholesale trade.

5. The fifth part of the report deals with the results of the survey in the field of retail trade. It is divided into two main sections: the first section deals with the results of the survey in the field of general retail trade, and the second section deals with the results of the survey in the field of specialized retail trade.